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8 Attorney for Defendant NATIONAL UNION FIRE INSURANCE
 9 COMPANY OF PITTSBURGH, PA.

10 **UNITED STATES DISTRICT COURT**

11 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

12 ADAMS GROUP, INC. and ADAMS GRAIN
 13 CO.,

CASE NO. 2:16-CV-01404-TLN-AC

14 Plaintiffs,

15 **STIPULATION AND [PROPOSED]
 16 ORDER TO STAY DUE TO SETTLEMENT
 17 OF UNDERLYING ACTION**

18 vs.

19 NORTHERN INSURANCE COMPANY OF
 20 NEW YORK and NATIONAL UNION FIRE
 21 INSURANCE COMPANY OF PITTSBURGH,
 22 PA,

23 Defendants.

24 WHEREAS, on or about March 14, 2014, Hector Sanchez, filed a personal injury complaint
 25 in the Superior Court of California, County of Yolo, against ADAMS GROUP, INC. and ADAMS
 26 GRAIN CO. (collectively "Adams") captioned *Hector Sanchez v. Adams Grain Co. and Adams*
 27 *Group, Inc., et. al*, Case No. PO14-446, alleging causes of action for Negligence, Negligence Per
 28 Se, Negligent Supervision, Negligent Retention, Premises Liability, Negligent Exercise of Retained
 Control, Products Liability-Strict Liability, Products Liability-Negligence and Intentional Infliction
 of Emotional Distress (hereinafter "Underlying Action");

WHEREAS, Adams, Northern and National Union previously agreed and stipulated to stay
 this matter to allow the Underlying Action to develop such that the deadline for Northern and
 National Union to file and serve their respective responses to the complaint in this action was
 extended to October 11, 2016 (Docs. 8 and 9);

1 WHEREAS, the parties in the Underlying Action have reached agreement on principal
2 settlement terms and are in the process of finalizing their settlement;

3 WHEREAS, the finalization of the settlement in the Underlying Action may lead to a
4 resolution of the issues in this matter and a dismissal of this action;

5 THEREFORE, Adams, Northern and National Union hereby agree and stipulate to continue
6 the stay of this matter for an additional 80 days to allow the settlement in the Underlying Action to
7 be finalized and for settlement discussions between Adams, Northern and National Union to take
8 place such that the deadline for Northern and National Union to file and serve their respective
9 responses to the complaint in this action is extended to December 30, 2016.

10 DATED: October 7, 2016 HANSON BRIDGETT LLP

11
12 By: /s/ Miles C. Holden (as authorized on October 7, 2016)
13 MILES C. HOLDEN, ESQ.
14 mholden@hansonbridgett.com
15 Attorneys for Plaintiffs ADAMS GROUP, INC. and
16 ADAMS GRAIN CO.

16 DATED: October 7, 2016 HAIGHT BROWN & BONESTEEL LLP

17
18 By: /s/ Laurie Lo (as authorized on October 7, 2016)
19 VICTOR R. ANDERSON III, ESQ.
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21 VALERIE A. MOORE, ESQ.
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25 Attorneys for Defendant ZURICH AMERICAN
26 INSURANCE COMPANY, as successor to NORTHERN
27 INSURANCE COMPANY OF NEW YORK

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1 DATED: October 7, 2016

HEROLD & SAGER

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By: /s/Andrew D. Herold
ANDREW D. HEROLD, ESQ.
aherold@heroldsagerlaw.com
Attorney for Defendant NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH, PA.

ORDER

The parties having so stipulated and agreed, it is hereby SO ORDERED. The above-referenced case is hereby stayed such that the deadline for Northern and National Union to file and serve their respective responses to the complaint in this action is extended to December 30, 2016.

Dated: October 11, 2016



Troy L. Nunley
United States District Judge