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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NORTHERN CALIFORNIA**

Crown Paper Liquidating Trust,

Plaintiff,

v.

American International Group, Inc. d/b/a AIG, a Delaware corporation; National Union Fire Insurance Company of Pittsburgh, Pa., a Pennsylvania corporation; AIG Domestic Claims, Inc. f/k/a AIG Technical Services Inc., a Delaware corporation; Marsh USA Risk & Insurance Services Inc. d/b/a Marsh USA Inc., a Delaware corporation; Marsh & McLennan Companies, Inc, a Delaware corporation; Marsh Ltd., a United Kingdom corporation; Finpro, a division of Marsh Ltd.; Richard E Cowan, and Does One through 50,

Defendants.

Case No. 3:07-cv-02308-MMC

**MOTION FOR DISMISSAL OF ALL
PENDING CLAIMS WITH PREJUDICE
AND ORDER THEREON**

Judge: Maxine M. Chesney
Dept.: 17C, Nineteenth Floor

The undersigned parties, having reached an out-of-court settlement of their dispute whereunder the parties agree to the dismissal by Plaintiff of all pending claims in consideration for

1 the payment by the undersigned Defendants of an undisclosed sum,¹ hereby jointly request that this
2 Court dismiss all pending claims with prejudice.

3 The parties further request that hearing on this motion be waived.

4 DATED this 8th day of December, 2008.

5 **BEUS GILBERT PLLC**

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International Group, Inc.; National Union Fire
Insurance Company of Pittsburgh, Pa; and AIG
Domestic Claims, Inc.

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23 ¹ The terms of this settlement were approved by Bankruptcy Judge Randall K. Newsome of the
24 United States Bankruptcy Court for the Northern District of California on November 24, 2008.
25 Judge Newsome's order is submitted herewith as Exhibit A.

~~PROPOSED~~ ORDER

Good cause appearing,

IT IS HEREBY ORDERED that all pending claims in this action are dismissed with prejudice. The parties shall each bear their own costs.

DATED: December 9, 2008



Hon. Maxine M. Chesney
United States District Judge

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