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 TRAVELERS PROPERTY CASUALTY  
 6 COMPANY, ET AL.

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

10 TRAVELERS PROPERTY CASUALTY )  
 COMPANY, et al. )  
 11 )  
 Plaintiffs, )  
 12 )  
 vs. )  
 13 )  
 FEDERATED MUTUAL INSURANCE )  
 14 COMPANY, a Minnesota Corporation )  
 15 Defendant. )  
 16 )

CASE NO.: 3:07-cv-03459-BZ

**STIPULATION AND [PROPOSED]  
 ORDER RE EXTENDING TIME TO  
 MOVE THE COURT TO RESTORE  
 THIS MATTER TO THE CALENDAR**

17 **WHEREAS** the Court entered Conditional Order of Dismissal on April 24, 2008 dismissing  
 18 the action with prejudice on the grounds that the parties have agreed to a settlement, provided that  
 19 any party may, within 60 days of the date of the order, move the Court to restore this matter to the  
 20 calendar on the grounds that the settlement has not been consummated;

21 **WHEREAS** pursuant to the parties' stipulation, the Court entered order on August 8, 2008  
 22 that the parties may, before October 22, 2008, move the Court to restore this matter to the calendar;  
 23 and

24 **WHEREAS** the settlement agreement between the parties has been finalized, three  
 25 settlement payments have been issued, and one last settlement payment is pending receipt of final  
 26 defense invoices in the underlying action;

27 ///  
 28 ///

1 **IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES HERETO,**  
2 through their respective counsel, that the parties may, before December 22, 2008, move the Court to  
3 restore this matter to the calendar on the grounds that the settlement has not been consummated.

4 DATED: October 8, 2008 MORALES FIERRO & REEVES

5  
6 By: /s/ Ramiro Morales  
7 Ramiro Morales  
8 Attorneys for Plaintiffs  
TRAVELERS PROPERTY CAS. CO., ET AL.

9 DATED: October 8, 2008 MEAGHER & GEER P.L.L.P.

10  
11 By: /s/ Laura J. Hanson  
12 Laura J. Hanson  
13 Jenny L. Sautter  
Attorneys for Defendant  
14 FEDERATED MUTUAL INSURANCE COMPANY

14 **ATTESTATION RE CONFORMED SIGNATURE**

15 Pursuant to General Order No. 45, I hereby attest that concurrence in the filing of the  
16 document has been obtained from Ms. Laura J. Hanson on October 8, 2008 at 11:38 a.m., which  
17 shall serve in lieu of her signature on this document.


18 DATED: October 8, 2008 MORALES FIERRO & REEVES

19  
20 By: /s/ Ramiro Morales  
21 Ramiro Morales  
22 Attorneys for Plaintiffs  
TRAVELERS PROPERTY CAS. CO., ET AL.

23 **ORDER RE EXTENDING TIME TO MOVE THE COURT TO RESTORE THIS MATTER  
TO CALENDAR**

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25  
26 Date: October 10, 2008

27   
28 Bernard Zimmerman  
United States Magistrate Judge