

1 STROOCK & STROOCK & LAVAN LLP
 2 MICHAEL F. PERLIS (State Bar No. 95992)
 3 mperlis@stroock.com
 4 RICHARD R. JOHNSON (State Bar No. 198117)
 5 rjohnson@stroock.com
 6 RACHAEL SHOOK (State Bar No. 251628)
 7 rshook@stroock.com
 8 2029 Century Park East, Suite 1800
 9 Los Angeles, California 90067-3086
 10 Telephone: 310-556-5800
 11 Facsimile: 310-556-5959
 12 lalendar@stroock.com

13 Attorneys for Defendant and Counterclaimant
 14 TWIN CITY FIRE INSURANCE COMPANY

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN FRANCISCO DIVISION**

14	CROWLEY MARITIME CORPORATION,)	Case No. CV-08-00830 SI
15	Plaintiff,)	[Hon. Susan Illston]
16	vs.)	STIPULATION TO FILE DOCUMENTS
17	FEDERAL INSURANCE COMPANY; TWIN)	UNDER SEAL PURSUANT TO JUDGE
18	CITY FIRE INSURANCE COMPANY; RLI)	ILLSTON'S STANDING ORDER, CIVIL
19	INSURANCE COMPANY; and DOES 1-20,)	L.R. 79-5, CIVIL L.R. 7-12, AND THE
20	inclusive,)	PARTIES' STIPULATED PROTECTIVE
21	Defendants.)	ORDER; [PROPOSED] ORDER
22)	Date: November 14, 2008
23)	Time: 9:00 a.m.
24)	Ctrm: 10
25)	[Declaration of Rachael Shook filed
26)	concurrently herewith]
27)	

28 STIPULATION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO JUDGE ILLSTON'S STANDING
 ORDER, CIVIL L.R. 79-5, CIVIL L.R. 7-12, AND THE PARTIES' STIPULATED PROTECTIVE
 ORDER; [PROPOSED] ORDER

(Case No. 08-0830 SI)

1 Pursuant to the Honorable Susan Illston's Standing Order, Civil L.R. 79-5, Civil L.R. 7-12,
2 and the Stipulated Protective Order submitted by the parties and entered by the Court in this action
3 on August 13, 2008 (the "Protective Order"), Plaintiff and Counterdefendant Crowley Maritime
4 Corporation ("Crowley"), Defendant Federal Insurance Company, Defendant and Counterclaimant
5 Twin City Fire Insurance Company, and Defendant RLI Insurance Company, (collectively, the
6 "Parties"), by and through their respective counsel of record, hereby stipulate and agree as follows:
7

8 The Parties have stipulated to a Protective Order which provides that the Parties may
9 designate certain materials "confidential." In discovery in the instant matter, Crowley produced
10 documents so designated (the "Sealable Materials").

11 The Parties have submitted currently-pending cross Motions for Summary Judgment and
12 may wish to use Sealable Materials in support of their respective Oppositions.

13 Each of the Parties will separately lodge the Sealable Materials that each intends to be filed
14 under seal pursuant to the provisions of the Protective Order and the procedures set forth in Judge
15 Illston's Standing Order.

16 This Stipulation, and the filing of documents under seal pursuant thereto, shall not
17 constitute acknowledgement that the documents marked "confidential" or filed under seal are, in
18 fact, properly designated confidential. The Parties reserve the right to contest, as provided in the
19 attached Protective Order, the confidentiality of any documents marked "confidential."
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Respectfully submitted,

Dated: October 14, 2008

PILLSBURY & LEVINSON, LLP
COVINGTON & BURLING LLP

By: /s/ Michael S. Greenberg
G.O. 45.X.B. authorization obtained
MICHAEL S. GREENBERG
Attorneys for Plaintiff and Counterdefendant
Crowley Maritime Corporation

Dated: October 14, 2008

RUDLOFF WOOD & BARROWS LLP
HOGAN & HARTSON LLP

By: /s/ Kevin A. Norris
G.O. 45.X.B. authorization obtained
KEVIN A. NORRIS
Attorneys for Defendant Federal Insurance
Company

Dated: October 14, 2008

STROOCK & STROOCK & LAVAN LLP

By: /s/ Richard R. Johnson
RICHARD R. JOHNSON
Attorneys for Defendant and
Counterclaimant Twin City Fire Insurance
Company

Dated: October __, 2008

MORISON ANSA HOLDEN ASSUNCAO
& PROUGH, LLP

By: _____
BRIAN E. SIMS
Attorneys for Defendant RLI Insurance
Company

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____



Hon. Susan Illston

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

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Respectfully submitted,

Dated: October , 2008

PILLSBURY & LEVINSON, LLP
COVINGTON & BURLING LLP

By: _____
MICHAEL S. GREENBERG
Attorneys for Plaintiff and Counterdefendant
Crowley Maritime Corporation

Dated: October , 2008

RUDLOFF WOOD & BARROWS LLP
HOGAN & HARTSON LLP

By: _____
KEVIN A. NORRIS
Attorneys for Defendant Federal Insurance
Company

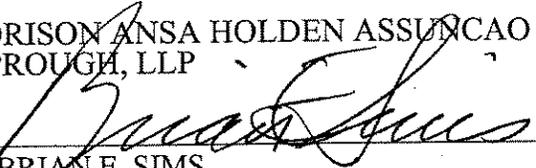
Dated: October _ , 2008

STROOCK & STROOCK & LAVAN LLP

By: _____
RICHARD R. JOHNSON
Attorneys for Defendant and
Counterclaimaint Twin City Fire Insurance
Company

Dated: October 10 2008

MORISON ANSA HOLDEN ASSUNCAO
& PROUGH, LLP

By: 
BRIAN E. SIMS
Attorneys for Defendant RLI Insurance
Company

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Susan Illston

STIPULATION TO FILE DOCUMENTS UNDER SEAL AND [PROPOSED] ORDER
- Case No. 08-0830 SI

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California, over the age of eighteen years, and not a party to the within action. My business address is: 2029 Century Park East, Suite 1800, Los Angeles, California 90067-3086. On October 14, 2008, I served the foregoing document(s) described as: **STIPULATION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO JUDGE ILLSTON'S STANDING ORDER, CIVIL L.R. 79-5, CIVIL L.R. 7-12, AND THE PARTIES' STIPULATED PROTECTIVE ORDER; [PROPOSED] ORDER** on the interested parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

See Service List Attached

- (VIA U.S. MAIL)** In accordance with the regular mailing collection and processing practices of this office, with which I am readily familiar, by means of which mail is deposited with the United States Postal Service at Los Angeles, California that same day in the ordinary course of business, I deposited such sealed envelopes, with postage thereon fully prepaid, for collection and mailing on this same date following ordinary business practices, addressed as set forth below.
- (VIA OVERNIGHT DELIVERY)** By causing such envelope to be delivered to the office of the addressee(s) at the address(es) set forth above by overnight delivery via Federal Express or by a similar overnight delivery service.
- (VIA E-MAIL)** By causing document(s) be delivered via electronic email to the office of the addressee(s) at the email address(es) provided to the court..

I declare that I am employed in the office of member of the bar of this court under whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 14, 2008 at Los Angeles, California.

Dino Shorté /s/ Dino Shorté
[Type or Print Name] [Signature]

1
2 **SERVICE LIST**

3 **Counsel for Plaintiff Crowley Maritime Corp.**

4 David B. Goodwin, Esq.
5 Deepa Varadarajan, Esq.
6 Covington & Burling LLP
7 One Front Street, 35th Floor
8 San Francisco, CA 94111-5356

9 **Counsel for Co-defendant Federal Insurance Co.**

10 G. Edward Rudloff, Jr., Esq.
11 Kevin A. Norris, Esq.
12 Rudloff Wood & Barrows LLP
13 Watergate Office Towers
14 2000 Powell Street, Suite 900
15 Emeryville, CA 94608

16 **Counsel for Co-defendant RLI Insurance Co.**

17 William Campbell Morison-Knox, Esq.
18 Michael D. Prough, Esq.
19 Brian E. Sims, Esq.
20 Morison Ansa Holden Assuncao & Prough, LLP
21 1550 Parkside Dr., Third Floor
22 Walnut Creek, California 94596-8068

23 **Counsel for Crowley:**

24 Philip L. Pillsbury, Jr.
25 Richard D. Shively, Esq.
26 Eric K. Larson, Esq.
27 Pillsbury & Levinson, LLP
28 The Transamerica Pyramid
600 Montgomery Street,
31st Floor San Francisco, CA 94111

29 **Counsel for Federal:**

30 David Newmann, Esq.
31 HOGAN & HARTSON L.L.P.
32 Columbia Square
33 555 Thirteenth Street, NW
34 Washington, DC 20004

35 Stephen Loney, ATTORNEY AT LAW
36 HOGAN & HARTSON LLP
37 1835 Market Street, 28th Floor
38 Philadelphia, PA 19103

STIPULATION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO JUDGE ILLSTON'S STANDING
ORDER, CIVIL L.R. 79-5, CIVIL L.R. 7-12, AND THE PARTIES' STIPULATED PROTECTIVE ORDER;
[PROPOSED] ORDER

(Case No. 08-0830 SI)