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December 30, 2010

VIA ECF and EMAIL

The Honorable Edward M. Chen
United States District Court
Northern District of California
450 Golden Gate Avenue
Courtroom C, 15th floor
San Francisco, CA 94102

**Re: *In re California Title Insurance Antitrust Cases*
N.D. Cal. Civil Case No. 08-CV-01341 JSW (EMC)**

Dear Magistrate Judge Chen:

The parties to this action jointly submit this letter to update the Court concerning the progress of their meet and confer discussions and to request a short extension of time to file their joint report with "each party's last and best offer as to [each] disputed item." (Dkt. No. 197). Following the hearing before Your Honor on December 22, counsel for all parties participated in two lengthy meet and confer sessions, spent significant time crafting proposals consistent with the Court's guidance at the hearing concerning phase one of discovery, and exchanged detailed letters proposing compromises on the issues in their discovery motions. As a result of these efforts, the parties have been able to significantly narrow their disputes.

Nevertheless, due to a variety of circumstances, the parties have not been able to complete the meet and confer process by today. The confluence of the holidays (making some counsel and their clients unavailable for various days between December 22nd and today), the winter storm in the New York area (which has prevented some counsel from being able to travel or work in their offices this week), and the fact that the court reporter informed counsel that a transcript of the December 22 hearing cannot be prepared before January 3, 2011 all combined to obstruct the completion of the parties' meet and confer efforts by today, the date by which Your Honor requested a joint report. (Dkt. No. 197.) As a result, the parties respectfully request an extension of time, until Wednesday, January 5, 2011, to submit that report.

This is the first extension the parties have sought with respect to any matter before your Honor. We believe that these additional days will enable the parties to meaningfully complete the meet and confer process, with the goal of eliminating or significantly narrowing disputes on as many issues as possible. Because some counsel's offices are closed next Monday, we selected next Wednesday as the earliest possible date by which the parties can both conclude their meet and confer discussions and prepare a joint report to the Court stating their positions on any

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remaining areas of disagreement. Counsel for plaintiffs and defendants attempted to reach the Court by telephone today to make this request, but received a message that the Court is closed until next week.

This letter is submitted on behalf of and with the approval of counsel for all parties in this action.

Respectfully submitted,

Girard Gibbs LLP

Plaintiffs' Interim Co-Lead Counsel

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IT IS SO ORDERED that parties may have until 1/5/11 to file the joint letter.

Edward M. Chen
U.S. Magistrate Judge
Dated: 1/5/11

