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12 Attorneys for Defendants  
 13 ZURICH AMERICAN INSURANCE COMPANY  
 14 and STEADFAST INSURANCE COMPANY

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

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 vs.

21 ZURICH INSURANCE COMPANY,  
 22 ZURICH AMERICAN INSURANCE  
 23 COMPANY and STEADFAST  
 24 INSURANCE COMPANY,

25 Defendant.

CASE NO. CV08-5005 (MMC)

**FURTHER STIPULATION AND  
~~PROPOSED~~ ORDER RE INITIAL CASE  
 MANAGEMENT DEADLINES AND  
 EXTENSION OF TIME TO FILE A  
 RESPONSIVE PLEADING**

1 WHEREAS, the United States of America filed this action on November 3, 2008;  
2 WHEREAS, the parties have been in communication through their respective attorneys;  
3 WHEREAS, the United States of America has received completed Waiver of Service of  
4 Summons forms from Steadfast Insurance Company (“Steadfast”) and Zurich American  
5 Insurance Company (“Zurich American”), executed December 4, 2008;

6 WHEREAS, this Court entered a Stipulation and Order Regarding Initial Case Deadlines  
7 and Management Issues on December 24, 2008 (Dkt. 8), in which initial case deadlines were  
8 postponed approximately 30 days to permit the parties to attend private mediation in January  
9 2009; and

10 WHEREAS, the parties attended private mediation on January 23, 2009, and desire to  
11 continue their mediation discussions;

12 The parties stipulate as follows:

- 13 1. The parties will attend a further mediation session on or about March 13, 2009.
- 14 2. The parties agree that the time for Steadfast and Zurich American to file an initial  
15 responsive pleading would be no sooner than March 23, 2009 and according to the  
16 following schedule:

17 (a) if any defendant terminates the mediation, March 23, 2009 or the day  
18 on which mediation is terminated, or

19 (b) if plaintiff terminates the mediation, either March 23, 2009 or 10 days  
20 after the plaintiff’s termination, whichever date is later.

21 The date of the e-filing of the termination notice will initiate the running of the  
22 time period for Steadfast and Zurich American to file their initial responsive  
23 pleading.

- 24 3. In order to accommodate conducting a further mediation session on March 13,  
25 2009, the parties have agreed and request that certain dates and deadlines be  
26 extended as follows:

27 (a) Initial Case Management Conference: on or about May 1, 2009.

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