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8 Attorneys for Defendants
AMERICAN INTERNATIONAL GROUP, INC., CHARTIS U.S., INC.
(erroneously sued as AIG Commercial Insurance Group, Inc. and
9 NATIONAL UNION FIRE INSURANCE COMPANY OF
PITTSBURGH, PA

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 WYNELLE M. CHADWICK,

13 Plaintiff,

14 v.

15 AMERICAN INTERNATIONAL GROUP,
16 INC.; AIG COMMERCIAL INSURANCE
17 GROUP, INC.; NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH,
18 PA.

19 Defendants.

CASE NO. 3:09-CV-03619 CRB

**STIPULATION AND ~~PROPOSED~~
ORDER TO PARTIALLY REVISE THE
COURT'S MINUTE ORDER OF
NOVEMBER 20, 2009**

20 All parties, by and through their respective counsel, hereby stipulate to partially revise the
21 Court's Minute Order as follows:

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23 **I.
RECITALS**

24 1. The parties have been working diligently toward moving this case forward in an efficient,
25 expeditious manner. The parties have exchanged initial disclosures and are engaged in settlement
26 discussions.

27 2. The parties wish to continue settlement discussions without expending potentially
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1 unnecessary expense and time pursuing additional discovery and law and motion activities. For
2 these reasons, the parties have agreed to extend the deadline for fact discovery for purposes of the
3 summary judgment motion and the summary judgment hearing for 60 days.

4 3. Accordingly, the parties have agreed to the following proposed revision of the Court's
5 November 20, 2009 Minute Order as follows.

6 **II.**
STIPULATION

7 The parties hereby stipulate to the following revision to the Court's Minute Order:

- 8 1. Completion of fact discovery for purposes April 29, 2010
9 of summary judgment motion (currently March 1, 2010)
- 10 2. Summary Judgment Hearing June 25, 2010
11 (currently April 16, 2010)

12 Dated: January 25, 2010

BIREN KATZMAN

13
14 By /s/ Matthew B.F. Biren
15 MATTHEW B.F. BIREN
Attorney for Plaintiff
WYNELLE M. CHADWICK

16 Dated: January 25, 2010

HAYES SCOTT BONINO ELLINGSON &
McLAY, LLP

17
18 By /s/ Stephen P. Ellingson
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22 CHARTIS U.S., INC., AND
23 NATIONAL UNION FIRE INSURANCE
24 COMPANY OF PITTSBURGH, PA
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