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

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 WYNELLE M. CHADWICK,
14 Plaintiff,
15 v.
16 AMERICAN INTERNATIONAL GROUP,
17 INC.; AIG COMMERCIAL INSURANCE
18 GROUP, INC.; NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH,
19 PA.
20 Defendants.

CASE NO. C09-03619 CRB

**STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE EARLY
NEUTRAL EVALUATION**

21 All parties, by and through their respective counsel, hereby stipulate to continue Early
22 Neutral Evaluation as follows:

23 **I.**
24 **RECITALS**

25 1. On Friday, February 5, 2010, the parties held their initial teleconference regarding
26 Early Neutral Evaluation. Present on the call were Matthew Biren for plaintiff, Stephen Ellingson
for defendants and the Early Neutral Evaluator, Anthony M. Boskovich.

27 2. The parties continue to work diligently toward moving this case forward in an
28

1 efficient, expeditious manner. The parties are engaged in settlement discussions.

2 3. The parties wish to continue settlement discussions without expending potentially
3 unnecessary expense and time preparing for and briefing the issues for Early Neutral Evaluation.
4 Consistent with the Court's Order granting a sixty day extension for matters related to the summary
5 judgment hearing, the parties have agreed to extend the deadline for Early Neutral Evaluation for 60
6 days.

7 4. Accordingly, the parties have agreed to the following proposed revision of the
8 Court's October 30, 2009 Order setting the ADR deadline as follows.

9 **II.**
STIPULATION

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

11 1. Deadline for ADR session May 3, 2010
12 (currently March 1, 2010)

13
14 Dated: February 25, 2010

BIREN KATZMAN

15 By //s//
16 MATTHEW B.F. BIREN
17 Attorney for Plaintiff
WYNELLE M. CHADWICK

18 Dated: February 25, 2010

HAYES SCOTT BONINO ELLINGSON &
McLAY, LLP

19
20 By //s//
21 STEPHEN M. HAYES
22 STEPHEN P. ELLINGSON
23 M. COLLEEN RYAN
24 Attorneys for Defendants
25 AMERICAN INTERNATIONAL GROUP, INC.,
26 CHARTIS U.S., INC., AND
27 NATIONAL UNION FIRE INSURANCE
28 COMPANY OF PITTSBURGH, PA

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~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation, the deadline for ADR session is continued as follows:

- 1. Deadline for ADR session May 3, 2010

Dated: February 26, 2010

HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT COURT JUDGE

