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Attorneys for Plaintiff

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 STEADFAST INSURANCE COMPANY)	Case No.: CV09-04098 SC
11 Plaintiff,)	STIPULATION AND PROPOSED ORDER
12 vs.)	TO EXTEND DATES
13 PROBUILDERS SPECIAL INSURANCE)	FIRST REQUEST
COMPANY RRG, ET AL.)	
14 Defendants.)	
15)	

16 Plaintiff Steadfast Insurance Company ("Plaintiff") and defendant American Safety Insurance
17 Company ("Defendant"), by and through counsel, stipulate and agree as follows:

18 WHEREAS, this matter involves an insurance coverage dispute between co-insurers of a
19 common insured in which Plaintiff solely incurred sums while Defendant disclaimed coverage;

20 WHEREAS, Plaintiff and Defendant (collectively "Parties") are actively involved in
21 settlement discussions in an effort to resolve the case;

22 WHEREAS, the Parties seek an extension of deadlines in order to complete settlement
23 discussions, hopefully resulting in a settlement that disposes of this case in its entirety;

24 WHEREFORE, the Parties are agreeable to extend all dates ninety (90) days such that
25 revised deadlines in the case are as follows:

- 26 February 11, 2011 Deadline to complete discovery
- 27 March 11, 2011 Deadline to file dispositive motions
- 28 April 14, 2011 Pre-Trial Conference (10:00 a.m.)

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May 4, 2011 Trial

IT IS SO AGREED.

Dated: September 13, 2010

MORALES FIERRO & REEVES

By: /s/ William C. Reeves
William C. Reeves
Attorneys for Plaintiff

Dated: September 13, 2010

BLAU AND ASSOCIATES

By: /s/ David Blau
David Blau
Attorneys for Defendant

The Court, the Honorable Samuel Conti presiding, having considered the stipulation of the parties, and good cause appearing, orders that revised deadlines in the case shall be as follows:

- February 11, 2011 Deadline to complete discovery
- March 11, 2011 Deadline to file dispositive motions
- April 14, 2011 Pre-Trial Conference (10:00 a.m.)
- May 4, 2011 Trial

IT IS SO ORDERED.

Dated: 9/14/10

