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August 20, 2013

Magistrate Judge Joseph C. Spero
Magistrate Judge Jacqueline Scott Corley
United States District Court
Northern District of California
450 Golden Gate Ave.
Courtroom F – 15th Floor
San Francisco, CA 94102

Re: Oliver Brown v. Asbestos Defendants, et al.
United States District Court, Northern District of California
Case No. 3:09-cv-04681-CRB
Our Client: The Goodyear Tire & Rubber Company

Dear Magistrate Judges Spero and Corley:

Pursuant to Magistrate Judge Corley's Settlement Conference Standing Order, I write to seek permission from the Court to excuse the representatives for our client The Goodyear Tire & Rubber Company ("Goodyear") and its insurance carriers from personally appearing at the settlement conference in the above-referenced matter set for August 28, 2013. Goodyear has multiple insurance carriers and representatives who are all located outside the State of California. Requiring each of them to travel in person to the Settlement Conference would, therefore, cause a serious financial burden. Further, their physical presence at the settlement conference is not likely to effect its outcome. Lead trial counsel who has extensive experience with settlement negotiations with Plaintiff's counsel will attend the Settlement Conference in person with settlement authority, making it unnecessary for all carriers and representatives to also be present. Additionally, Goodyear's client and carrier representatives will be made available via telephone standby for the Settlement Conference.

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In compliance with Magistrate Judge Corley's Settlement Conference Standing Order, we wrote to all counsel of record on August 16, 2013 inquiring as to whether any party had an objection to Goodyear's client and carrier representatives attending the Settlement Conference via telephone standby. To date, we have received no such objection. Therefore, we respectfully request that Court excuse our client and carrier representatives from attending the Settlement Conference in person.

Very truly yours,

GORDON & REES LLP



Kathryn J. LaFevers

cc: All Counsel of Record

Dated: 8/22/2013

