

E-Filed 10/29/10

1 W. DAVID CAMPAGNE (BAR NO. 111372)
 DANIEL S. CHO (BAR NO. 258729)
 2 SINNOTT, PUEBLA, CAMPAGNE & CURET, APLC
 555 Montgomery, Suite 720
 3 San Francisco, California 94111
 Telephone: (415) 352-6212
 4 Facsimile: (415) 352-6224
 dcampagne@spcclaw.com
 5 dcho@spcclaw.com

6 RICHARD H. NICOLAIDES, JR. (pro hac vice)
 LAURA A. McARDLE (pro hac vice)
 7 JAMES F. BAFFA (pro hac vice)
 BATES CAREY NICOLAIDES LLP
 8 191 North Wacker Drive, Suite 2400
 Chicago, Illinois 60606
 9 Telephone: (312) 762-3100
 Facsimile: (312) 762-3200
 10 rnicolaides@bcnlaw.com
 lmcardle@bcnlaw.com
 11 jbaffa@bcnlaw.com

12 Attorneys for Defendant
 NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.

13
 14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 15 **SAN FRANCISCO DIVISION**

16 SILGAN CONTAINERS LLC,

Case No. C-09-5971-RS

17 Plaintiff,

18 vs.

~~[SILGAN CONTAINERS30, 2010, as follow~~

19 NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA, and
 20 LIBERTY MUTUAL IRE INSURANCE
 COMPANY,

AS MODIFIED BY COURT

21 Defendants.
 22
 23
 24
 25

26 1. NON-EXPERT DISCOVERY. On or before November 9, 2010, non-expert
 27 discovery shall be completed by the parties, with one exception: National Union may complete
 28 the deposition of non-party Del Monte Foods Company on or before December 9, 2010. **

[Silgan Containers

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

10/29/10

A handwritten signature in blue ink, appearing to read "Richard Seabury". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

** In the event National Union wishes to pursue followup discovery reasonably related to documents produced by, and the deposition of, Del Monte, the parties shall meet and confer to attempt to reach agreement as to whether and to what extent any such discovery shall go forward notwithstanding expiration of the cutoff date.