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 15 TAMMI JONES

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23 Attorneys for Defendants

24 **UNITED STATES DISTRICT COURT**

25 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

26 TAMMI JONES,

Case No. CV-10-1374 EMC

27 Plaintiff,

[The Honorable Edward M. Chen]

28 vs.

29 AMERICAN INTERNATIONAL GROUP,  
 30 INC.; NATIONAL UNION FIRE  
 31 INSURANCE COMPANY OF PITTSBURGH,  
 32 PA and CHARTIS CLAIMS, INC., formerly  
 33 known as AIG DOMESTIC CLAIMS, INC.;  
 34 and DOES ONE through TWENTY,

**STIPULATION AND ORDER TO PERMIT  
 PLAINTIFF TO INCLUDE DEFENDANT  
 CHARTIS CLAIMS, INC. (FORMERLY  
 KNOWN AS AIG DOMESTIC CLAIMS,  
 INC.) IN THE THIRD AMENDED  
 COMPLAINT AND DEFENDANT'S  
 RIGHT TO RESPOND BY ANSWER OR  
 MOTION**

35 Defendants.

36 Plaintiff TAMMI JONES and Defendant CHARTIS CLAIMS, INC. (formerly known as AIG  
 37 DOMESTIC CLAIMS, INC.) hereby stipulate as follows:

38 WHEREAS, by a Minute Order dated November 17, 2010, the Court ordered Plaintiff to file

**STIPULATION AND ORDER TO PERMIT PLAINTIFF TO INCLUDE DEFENDANT CHARTIS CLAIMS,  
 INC. (FORMERLY KNOWN AS AIG DOMESTIC CLAIMS, INC.) IN THE THIRD AMENDED COMPLAINT  
 AND DEFENDANT'S RIGHT TO RESPOND BY ANSWER OR MOTION**

1 a Second Amended Complaint by November 19, 2010, and Defendants to file their response within  
2 20 days; and

3 WHEREAS, pursuant to stipulation of December 9, 2010, that Plaintiff file a Third Amended  
4 Complaint by 5:00 p.m. on December 16, 2010, against defendants, and defendants not be required  
5 to respond to plaintiff's Second Amended Complaint; and

6 WHEREAS, the stipulation between TAMMI JONES and defendants filed on December 9,  
7 2010, inadvertently failed to include Defendant CHARTIS CLAIMS, INC. (formerly known as AIG  
8 DOMESTIC CLAIMS, INC.), a defendant in both the First Amended Complaint and the Second  
9 Amended Complaint;

10 The Parties through their respective counsel hereby stipulate and agree as follows, and  
11 request that the Order of the Court entered on December 16, 2010, be amended as follows:

12 1. Plaintiff may include in the Third Amended Complaint which will be filed by 5:00  
13 p.m. on December 16, 2010, Defendant CHARTIS CLAIMS, INC. (formerly known  
14 as AIG DOMESTIC CLAIMS, INC.). With this stipulation, Defendants do not agree  
15 and do not waive the right to argue that any Chartis entity is a proper defendant to  
16 this action. Defendants reserve the right to challenge all claims against any  
17 Defendant, including Chartis entities, by motion, including, but not limited to,  
18 motions to dismiss and motions to strike.

19 2. Defendants need not file any response to the allegations against Defendant  
20 CHARTIS CLAIMS, INC. (formerly known as AIG DOMESTIC CLAIMS, INC.)  
21 in the Second Amended Complaint since it will be superceded by the Third Amended  
22 Complaint. Instead, Defendants will respond to the allegations against Defendant  
23 CHARTIS CLAIMS, INC. (formerly known as AIG DOMESTIC CLAIMS, INC.)  
24 in the Third Amended Complaint, by way of answer or motion(s), within 20 days  
25 after plaintiff files her Third Amended Complaint.

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Date: December 16, 2010

/s/ Richard Seltzer, Esq.

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RICHARD SELTZER, ESQ.  
Attorney for Plaintiff

Date: December 16, 2010

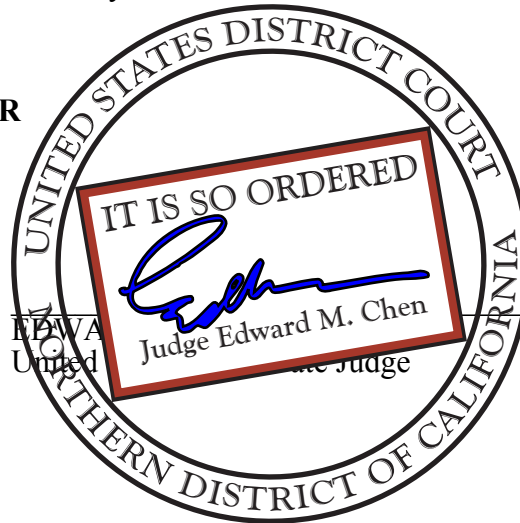
/s/ Rebecca R. Weinreich, Esq.

\_\_\_\_\_  
REBECCA R. WEINREICH, ESQ.  
Attorney for Defendants

**ORDER**

**IT IS SO ORDERED.**

Date: 12/17/10



1 Tammi Jones v. AIG Risk Management, et al.  
CV 10-01374 EMC

2 CERTIFICATE OF SERVICE  
3 28 U.S.C. §1746

4 STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA:

5 At the time of service, I was over 18 years of age and not a party to the action. My business  
6 address is Two Theatre Square, Suite 234, Orinda, California 94563. I am employed in the office  
of a member of the bar of this Court at whose direction the service was made.

7 On the date listed below, I served the following documents:

8 **STIPULATION AND ORDER TO PERMIT PLAINTIFF TO INCLUDE DEFENDANT**  
9 **CHARTIS CLAIMS, INC. (FORMERLY KNOWN AS AIG DOMESTIC CLAIMS, INC.)**  
10 **IN THE THIRD AMENDED COMPLAINT AND DEFENDANT'S RIGHT TO**  
11 **RESPOND BY ANSWER OR MOTION**

11 \_\_\_\_\_ by transmitting via facsimile the above document(s) to the fax number(s) set forth below  
12 on this date before 5:00 p.m.

13 \_\_\_\_\_ by placing the document(s) listed above in a sealed envelope with postage thereon fully  
14 prepaid, in the United States mail at Orinda, California addressed as set forth below.

15 \_\_\_\_\_ by causing personal delivery by messenger of the document(s) listed above to the  
16 person(s) at the address(es) set forth below.

17 \_\_\_\_\_ by personally delivering the document(s) listed above to the person(s) at the address(es)  
18 set forth below.

19 X Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court  
20 using the CM/ECF system, which sent notification of that filing to the persons listed  
21 below.

22 Rebecca R. Weinreich, Esq.  
23 Heller-Ann Hancock, Esq.  
24 LEWIS BRISBOIS BISGAARD & SMITH LLP  
25 221 North Figueroa Street, Suite 1200  
26 Los Angeles, California 90012  
27 Telephone: (213) 250-1800  
28 Facsimile: (213) 250-7900  
Email: weinreich@lbbslaw.com  
hhancock@lbbslaw.com

I declare under penalty of perjury under the laws of the United States of America that the  
above is true and correct.

Executed at Orinda, California, on December 16, 2010.

\_\_\_\_\_  
Shawn DeMello