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1 **SEDGWICK, DETERT, MORAN & ARNOLD LLP**
 2 BRUCE D. CELEBREZZE Bar No. 102181
 3 bruce.celebrezze@sdma.com
 4 MATTHEW C. LOVELL Bar No. 189728
 5 matthew.lovell@sdma.com
 6 One Market Plaza
 7 Steuart Tower, 8th Floor
 8 San Francisco, California 94105
 9 Telephone: (415) 781-7900
 10 Facsimile: (415) 781-2635

11 Attorneys for Defendant Travelers Property
 12 Casualty Company Of America

13 **GAUNTLETT & ASSOCIATES**
 14 David A. Gauntlett (SBN 96399)
 15 James A. Lowe (SBN 214383)
 16 Andrew M. Sussman (SBN 112418)
 17 18400 Von Karman, Suite 300
 18 Irvine, California 92612
 19 Telephone: (949) 553-1010
 20 Facsimile: (949) 553-2050
 21 info@gauntlettlaw.com
 22 jal@gauntlettlaw.com
 23 ams@gauntlettlaw.com

24 Attorneys for Plaintiff Michael Taylor Designs, Inc.

25 UNITED STATES DISTRICT COURT
 26 FOR THE NORTHERN DISTRICT OF CALIFORNIA

27 MICHAEL TAYLOR DESIGNS, INC., a
 28 California corporation,
 Plaintiff,

v.

TRAVELERS PROPERTY CASUALTY
 COMPANY OF AMERICA, a Connecticut
 corporation,
 Defendant.

CASE NO. C10-02432-RS

**STIPULATED REQUEST TO CONTINUE
 HEARING DATE ON PLAINTIFF'S
 MOTION FOR PARTIAL SUMMARY
 JUDGMENT RE QUANTIFICATION OF
 DAMAGES**

Former Hearing Date: April 7, 2011
 Requested New Hearing Date: April 14, 2011
 Time: 1:30 p.m.
 Judge: Hon. Richard Seeborg
 Court: Courtroom 3, 17th Floor

PLEASE TAKE NOTICE THAT counsel for defendant Travelers Property Casualty
 Company of America ("Travelers") and plaintiff Michael Taylor Designs, Inc. ("MTD")
 (collectively, "the Parties") agree and stipulate as follows:

1 1. WHEREAS, MTD filed a Motion for Partial Summary Judgment Re: Quantification
2 of Damages (“the Motion”) on January 28, 2011 (ECF Nos. 39-42);

3 2. WHEREAS, on February 7, 2011, this Court issued an Order that: “continued the
4 hearing on the Motion to April 7, 2011, with the deadline for any opposition extended
5 accordingly[,]” and directed the parties to meet and confer to resolve or narrow their disputes
6 concerning the issues raised in the Motion (ECF No. 43, at 2:5-9);

7 3. WHEREAS, the Parties have agreed on the terms of a resolution of the issues raised
8 in the Motion, and wish to continue the hearing date, opposition date, and reply date set for the
9 Motion to allow the Parties to prepare and submit a proposed stipulated judgment that would
10 resolve the Motion and terminate this action, reserving all rights of appeal;

11 NOW, THEREFORE, THE PARTIES STIPULATE, AND REQUEST THE COURT TO
12 ORDER, AS FOLLOWS:

13 1. The April 7, 2011 hearing date for the Motion (ECF Nos. 39-42) shall be continued
14 to April 14, 2011, at 1:30 p.m.,

15 2. The opposition and reply dates for the Motion shall be continued accordingly, to
16 March 24, 2011 and March 31, 2011, respectively.

17 IT IS SO STIPULATED

18 DATED: March 17, 2011

SEDGWICK, DETERT, MORAN & ARNOLD LLP

19
20 By: /s/ Matthew C. Lovell

Bruce D. Celebrezze

Matthew C. Lovell

Attorneys for Defendant Travelers Property
Casualty Company of America

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22
23 DATED: March 17, 2011

GAUNTLETT & ASSOCIATES

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25 By: /s/ Andrew M. Sussman

Andrew M. Sussman

Attorneys for Plaintiff Michael Taylor Designs, Inc.

1 **ATTESTATION OF FILING**

2 Pursuant to General Order 45.X.B, I attest that I have obtained concurrence in the filing of
3 this document from the parties listed above.

4 /s/ Matthew C. Lovell
5 Matthew C. Lovell

6
7 **IT IS SO ORDERED:**

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9 _____
10 **RICHARD SEEBORG**
UNITED STATES DISTRICT JUDGE

11 DATED: 3/18/11

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