

1 Mark W. Peck (State Bar No. 172190)  
 WILSON & McQUEENY  
 2 500 North Brand Boulevard, Suite 900  
 Glendale, California 91203  
 3 Telephone: (818) 547-6541  
 Fax: (818) 547-6582  
 4 mark.peck@ffic.com

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 6 Attorneys for Defendant  
 FIREMAN'S FUND INSURANCE COMPANY

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 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

11 VALLEY FORGE INSURANCE  
 COMPANY, A Corporation,

12 Plaintiff,

13 vs.

14 FIREMAN'S FUND INSURANCE  
 15 COMPANY and DOES 1 - 10,

16 Defendants.

CASE NO: CV-02881-JCS

*[Assigned for All Purposes to Magistrate  
 Judge Joseph C. Spero]*

**FURTHER STIPULATION TO EXTEND  
 DATE FOR RESPONSIVE PLEADING  
 TO COMPLAINT**

WILSON & McQUEENY  
 500 North Brand Boulevard  
 Suite 900  
 Glendale, California 91203  
 Telephone: (818) 547-6503

17  
 18 Plaintiff Valley Forge Insurance Company and Defendant Fireman's Fund Insurance  
 19 Company stipulate as follows:

20 Plaintiff Valley Forge Insurance Company agrees that an order granting a further  
 21 extension of time for Defendant Fireman's Fund Insurance Company to file a responsive  
 22 pleading to Plaintiff Valley Forge Insurance Company's Complaint for Subrogation, Equitable  
 23 Indemnity, and Equitable Contribution is appropriate and in the interest of the parties and the  
 24 court.

25 The parties require the extension in time for the following reasons: (1) to determine if the  
 26 parties are amenable to entering into a binding ADR option; (2) to discuss settlement of the  
 27 matter; and (3) to discuss the possible removal of this lawsuit to state court, which would avoid  
 28

**FURTHER STIPULATION TO EXTEND DATE  
 FOR RESPONSIVE PLEADING TO COMPLAINT**

1 the unnecessary filing of a Rule 12 motion to dismiss.

2 Pursuant to the parties' agreement, the parties request an order that the responsive  
3 pleading is now due on or before September 24, 2010.

4 DATED: August 17, 2010

5 WILSON & McQUEENY

6 By: 

7 Mark W. Peck  
8 Attorneys for Defendant  
9 FIREMAN'S FUND INSURANCE COMPANY

10 DATED: August 18, 2010

11 COLLIAU ELENILS MURPHY CARLUCCIO KEENER  
12 & MORROW

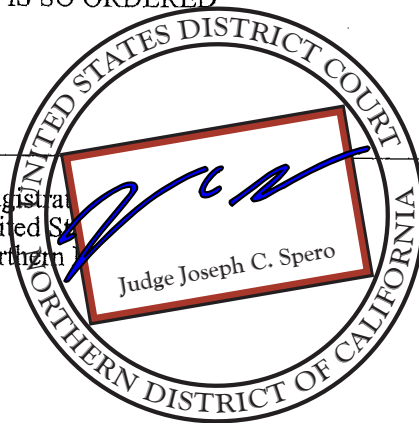
13 By: 

14 William D. Paoli  
15 Attorneys for Plaintiff  
16 VALLEY FORGE INSURANCE COMPANY

17 IT IS SO ORDERED

18 DATED: August 24, 2010

19 Magistrate  
20 United States  
21 Northern



Judge Joseph C. Spero

22 WILSON & McQUEENY  
23 500 North Brand Boulevard  
24 Suite 900  
25 Glendale, California 91203  
26 Telephone: (818) 547-6503

**PROOF OF SERVICE**

1 I am employed in the City of Glendale, County of Los Angeles; I am over the age of  
2 eighteen years and not a party to the within action; my business address is 500 North Brand  
3 Boulevard, Suite 900, Glendale, California 91203.

4 On August 19, 2010, I served, via CM/ECF the foregoing document described as:

5 **FURTHER STIPULATION TO EXTEND DATE FOR RESPONSIVE PLEADING TO**  
6 **COMPLAINT** on the counsel for the interested party(ies) in said action addressed as follows:

7 William D. Paoli, Esq.  
8 Colliau Elenius Murphy Carluccio Keener & Morrow  
9 555 Mission Street, Suite 330  
10 San Francisco, CA 94105  
11 Tel: (415) 932-7000  
12 Fax: (415) 932-7001  
13 E-Mail: william.paoli@cna.com

14  X  **By CM/ECF Transmission.** Based on a court order to accept service by  
15 electronic transmission, I caused the document to be sent to the person listed above.

16 I declare that I am employed in the office of a member of the bar of this court at whose  
17 direction the service was made. I declare under penalty of perjury under the laws of the United  
18 States of America that the above is true and correct.

19 DATED: August 19, 2010, at Glendale, California.

20  /S/   
21 \_\_\_\_\_  
22 Vickie C. Heredia  
23  
24  
25  
26  
27  
28

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