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 2 Wolkin · Curran, LLP
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5 Attorneys for Defendant
 EMPLOYERS FIRE INSURANCE COMPANY

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 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA -**
 10 **SAN FRANCISCO DIVISION**

11 JAMES JARDINE, an individual,
 12 Plaintiff,

13 v.

14 MARYLAND CASUALTY COMPANY, a
 corporation, and DOES 1 through 50,
 15 Defendants.
 16

Case No. 3:10-cv-03318 SC,
 consolidated with
 Case No. 3:10-cv-03319 SC;
 Case No. 3:10-cv-03335 SC and
 Case No. 3:10-cv-03336 SC

17 JAMES JARDINE, an individual,
 18 Plaintiff,

19 v.

20 EMPLOYERS FIRE INSURANCE
 COMPANY, a corporation, and DOES 1
 21 thorough 50,
 22 Defendants.
 23

Case No. 3:10-cv-03335 SC; and
 Case No. 3:10-cv-03336 SC

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE TRIAL
 DATE TO FEBRUARY 13, 2012**

24 IT IS HEREBY STIPULATED by and between plaintiff, JAMES JARDINE
 25 (“Jardine”), and defendants MARYLAND CASUALTY COMPANY (“Maryland”) and
 26 EMPLOYERS FIRE INSURANCE COMPANY (“Employers”), by and through their
 27 attorneys of record, that good cause exists and the parties request that the Court continue the
 28 trial date from January 23, 2012 until **February 13, 2012:**

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1. In order to accommodate discovery and scheduling issues, the parties previously stipulated to continue the trial date in this matter until October 3, 2011 or a date as soon thereafter as convenient to the Court. (See *Wolkin Declaration*, ¶ 3).

2. In response to this stipulation, the Court ordered the continuation of the trial date in the above consolidated actions from September 6, 2011 to January 23, 2012.

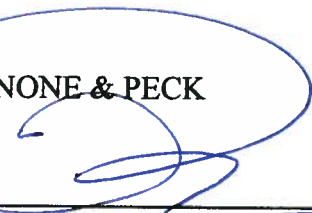
3. However, counsel for Employers, Brandt L. Wolkin, is set to be in trial in state court in another matter at that time. Trial of the other state court matter involves over thirteen parties, most with multiple counsel, and was set as of March 16, 2011. (See *Wolkin Declaration*, ¶ 5).

4. In order to accommodate Mr. Wolkin's trial schedule, the parties have agreed to a short continuation of the trial date from January 23, 2012 to **February 13, 2012**.

6. Based on the foregoing, and pursuant Local Rule 6-2, good cause exists for the Court to modify the Joint Stipulation and Order to Continue The Trial Date And Pre Trial Order entered on May 9, 2011 and to continue the trial date until February 13, 2012 and to continue the pretrial and trial deadlines as indicated below.


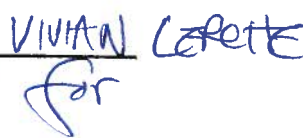
IT IS SO STIPULATED.

Dated: 5/25/11

SCHENONE & PECK
By: 

Ronald G. Peck
Attorney for Plaintiff
JAMES JARDINE

Dated: 5/25/11

BISHOP | BARRY | DRATH
By:  

Jonathan Gross
Attorneys for Defendant
MARYLAND CASUALTY COMPANY

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Dated: 5/26/11

WOLKIN • CURRAN, LLP

By: 

Brandt L. Wolkin
Dawn A. Silberstein
Attorneys for defendant
EMPLOYERS FIRE INSURANCE
COMPANY

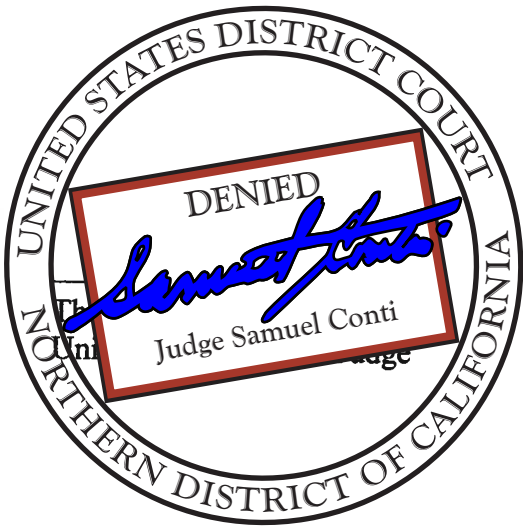
[PROPOSED] ORDER

PURSUANT TO THE PARTIES' STIPULATION, the Court finds good cause to continue the trial date in this action. The trial date of this action is hereby continued to _____, 2012 and the pre-trial deadlines are modified as follows:

Event	Current Deadline	Proposed Date
Factual Discovery	11/23/11	
Motion Cut Off	12/9/11	
Expert Disclosure	11/23/11	
Rebuttal Expert Disclosure	12/9/11	
Pre-Trial Conference	1/13/12	

IT IS SO ORDERED.

Dated: May 27, 2011



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DECLARATION OF SERVICE

I, Angela Lee Rojas, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the within entitled action. I am employed at Wolkin · Curran, LLP, 555 Montgomery Street, Suite 1100, San Francisco, California 94111.

On **26 May 2011** I served the attached document, **STIPULATION AND [PROPOSED] ORDER TO CONTINUE TRIAL DATE TO FEBRUARY 13, 2012**, on the interested parties in said action, by placing a true copy thereof in a sealed envelope(s) or package(s), with delivery fees or postage fully prepaid, addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

and served the named document in the manner(s) indicated below:

BY ELECTRONIC SERVICE: I transmitted true and correct copy(ies) of the above document(s) by electronic service from: "arojas@wolkincurran.com" on **26 May 2011** to the addressee(s) listed on the attached service list. A signed copy of this affidavit or certificate of mailing accompanied the above named document(s).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that I am employed in the office of a member of the bar of this court at whose direction the service was made. Executed 26 May 2011, at San Francisco, California.

/s/ Angela Rojas

Angela Lee Rojas

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SERVICE LIST

Jonathan Gross, Esq. Vivian Leung Lerche, Esq. Bishop Barry Drath Watergate Tower III 2000 Powell Street, Suite 1425 Emeryville, CA 94608 Tel: 510/596-0888 Fax: 510/596-0899 E-mail: jgross@bishop-barry.com E-mail: vlerche@bishop-barry.com	Counsel for <i>Maryland Casualty Company</i>
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Case No. 3:10-cv-03335 SC; and
Case No. 3:10-cv-03336 SC

**DECLARATION OF BRANDT
WOLKIN IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER TO CONTINUE TRIAL
DATE TO FEBRUARY 13, 2012**

24 I, Brandt L. Wolkin, declare as follows:

25 1. I am an attorney licensed to practice in the State of California and admitted
26 before the Federal District Court for the Northern District of California. I have personal
27 knowledge of the following facts and could and would competently testify thereto if called
28 upon to do so.

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DECLARATION OF SERVICE

I, Angela Lee Rojas, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the within entitled action. I am employed at Wolkin · Curran, LLP, 555 Montgomery Street, Suite 1100, San Francisco, California 94111.

On 26 May 2011 I served the attached document, **DECLARATION OF BRANDT WOLKIN IN SUPPORT OF STIPULATION AND [PROPOSED] ORDER TO CONTINUE TRIAL DATE TO FEBRUARY 13, 2012**, on the interested parties in said action, by placing a true copy thereof in a sealed envelope(s) or package(s), with delivery fees or postage fully prepaid, addressed as follows:

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/s/ Angela Rojas

Angela Lee Rojas

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