

1 Brandt L. Wolkin, Esq., SBN 112220  
 Dawn A. Silberstein, Esq., SBN 167936  
 2 Wolkin · Curran, LLP  
 555 Montgomery Street, Suite 1100  
 3 San Francisco, California 94111  
 Telephone: (415) 982-9390  
 4 Facsimile: (415) 982-4328

5 Attorneys for Defendant  
 ONEBEACON INSURANCE COMPANY

6  
 7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA -**  
 10 **SAN FRANCISCO DIVISION**

11 JAMES JARDINE, an individual,

12 Plaintiff,

13 v.

14 ONEBEACON INSURANCE COMPANY,  
 a corporation, and DOES 1 through 50,

15 Defendants.

Case No. C-10-3336 SC, consolidated for pre-  
 trial purposes with:  
 Case No. C-10-3318-SC;  
 Case No. C-10-3319-SC; and  
 Case No. C-10-3335-SC.

**STIPULATION AND ~~PROPOSED~~  
 ORDER REGARDING MOTION FOR  
 SUMMARY JUDGMENT-RELATED  
 BRIEFING DEADLINES**

The Honorable Judge Samuel Conti

16  
 17  
 18  
 19  
 20 Counsel for the above action hereby stipulate and agree to the following extensions  
 21 of time to file Opposition and Reply briefing in response to defendant ONEBEACON  
 22 INSURANCE COMPANY'S (hereinafter, "ONEBEACON") Motion for Summary  
 23 Judgment filed on March 2, 2011 in the above matter, which motion shall be heard April 8,  
 24 2011, and respectfully request the Court issue an order approving same.

25 Plaintiff JAMES JARDINE (hereinafter, "PLAINTIFF") shall file its Opposition to  
 26 ONEBEACON'S motion on or before **Thursday, March 24, 2011**.

27 ONEBEACON shall file any papers in Reply to PLAINTIFF'S Opposition on or  
 28 before **Thursday, March 31, 2011**.

1 **IT IS SO STIPULATED:**

2 Dated: March 18, 2011

WOLKIN • CURRAN, LLP

3

*/s/ Brandt Wolkin*

4

5 By: \_\_\_\_\_

Brandt L. Wolkin  
Dawn A. Silberstein

6

Lead Trial Counsel for Defendant  
OneBeacon Insurance Company

7

8

9 Dated: March 18, 2011

LAW OFFICE OF SCHENONE & PECK

10

*/s/ Ronald Peck*

11

12 By: \_\_\_\_\_

Ronald G. Peck

13

Lead Trial Counsel for Plaintiff James Jardine

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

**[Proposed] ORDER**

Pursuant to the above Stipulation, the Court hereby approves the following briefing schedule in regard to ONEBEACON’S Motion for Summary Judgment:

PLAINTIFF shall file its Opposition to ONEBEACON’S motion on or before **Thursday, March 24, 2011.**

ONEBEACON shall file any papers in Reply to PLAINTIFF’S Opposition on or before **Thursday, March 31, 2011.**

**IT IS SO ORDERED.**

Dated: March 22, 2011



---

The Honorable Judge Samuel Conti,  
Judge of the United States District Court,  
in and for the Northern District of California,  
San Francisco Division.

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

**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 **18 March 2011** I served the attached document, STIPULATION AND [PROPOSED] ORDER REGARDING MOTION FOR SUMMARY JUDGMENT-RELATED BRIEFING DEADLINES, 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:

  x   **BY ELECTRONIC SERVICE:** I transmitted true and correct copy(ies) of the above document(s) by electronic service from: “arojas@wolkincurran.com” on **18 March 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 18 March 2011, at San Francisco, California.

*/s/ Angela Rojas*

\_\_\_\_\_  
Angela Lee Rojas

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

**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: <a href="mailto:jgross@bishop-barry.com">jgross@bishop-barry.com</a> E-mail: <a href="mailto:vlerche@bishop-barry.com">vlerche@bishop-barry.com</a>	Counsel for <i>Maryland Casualty Company</i>
--	--