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7 Attorneys for Plaintiff  
 NATIONAL UNION FIRE INSURANCE COMPANY OF  
 8 PITTSBURGH, PA.

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 OAKLAND DIVISION

13 NATIONAL UNION FIRE INSURANCE  
 14 COMPANY OF PITTSBURGH, PA.,

15 Plaintiff,

16 v.

17 PAYLESS SHOE SOURCE, INC. and  
 COLLECTIVE BRANDS, INC.,

18 Defendants.  
 19

Case No. CV 11 1892 EMC

**STIPULATION FOR FURTHER  
 EXTENSION OF TIME TO RESPOND TO  
 COMPLAINT ; ORDER**

21 Pursuant to Civil Local Rule 6-1(a) for the Northern District of California, Plaintiff  
 22 National Union Fire Insurance Company of Pittsburgh, PA and Defendants, Payless Shoe  
 23 Source, Inc. and Collective Brands, Inc. (collectively, with Plaintiff, the "Parties"), by their  
 24 undersigned attorneys, stipulate to a further extension of time for Defendants to answer, move, or  
 25 otherwise respond to the Complaint in this matter, without waiver of any rights, claims or  
 26 defenses, including the right to seek further extensions.  
 28

Sedgwick<sup>LLP</sup>

1 On May 26, 2011, the Parties submitted to the Court a Stipulation to Extend Time to  
2 Respond to Complaint, extending Defendants' time to respond to the Complaint through July 19,  
3 2011. (ECF No. 8.) Pursuant to Civil Local Rule 6-1(a), the parties by and through their  
4 counsel, stipulate to a further extension of time, as follows:

- 5 1. Defendants shall answer, move, or otherwise respond to Plaintiff's Complaint  
6 for Declaratory Relief on or before August 18, 2011 (the "Response Date");
- 7 2. This extension does not alter the date of any event or any deadline already fixed  
8 by Court order, as all such deadlines were vacated pursuant to the Court's  
9 Reassignment Order (ECF No. 13);
- 10 3. Defendants agree not to commence any action, or maintain any proceedings,  
11 against Plaintiff in any other jurisdiction in connection with the claims in this  
12 action at any time prior to the Response Date; provided, however, that this  
13 stipulation does not limit in any way Defendants' right or ability to commence  
14 an action or maintain proceedings, against Plaintiff in connection with the  
15 claims in this action on or after the Response Date;
- 16 4. By entering into this Stipulation, the Parties do not waive, and expressly  
17 preserve, any and all rights, claims and defenses, including all defenses relating  
18 to jurisdiction, venue and arbitrability.

1 Respectfully submitted,

2 Dated: July 13, 2011

Dated: July 13, 2011

3  
4 /s/ Robert A. Sacks

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21 Brands, Inc.

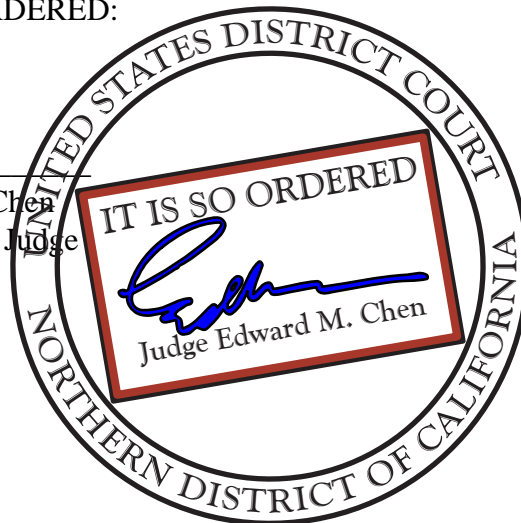
/s/ Nicholas J. Boos

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Attorneys for Plaintiff  
National Union Fire Insurance Company of  
Pittsburgh, PA

22 IT IS SO ORDERED:

23  
24 Edward M. Chen  
25 U.S. District Judge



1 I, Nicholas J. Boos, am the ECF User whose ID and password are being used to file this  
2 Stipulation To Extend Time To Respond To The Complaint. In compliance with General Order  
3 45, X.B., I hereby attest that Robert A. Sacks and Sverker K. Högberg have concurred in this  
4 filing.

5 Dated: July 13, 2011

/s/ Nicholas J. Boos

Nicholas J. Boos