

1 other limited topics. It is critical that Defendants thoroughly review and analyze Plaintiffs'
2 medical records to assess their claims for damages. Moreover, the parties are discussing dates
3 for additional depositions to be taken during the month of March 2012.

4 During defendant True Manufacturing's Federal Rule of Civil Procedure rule 30(b)(6)
5 deposition taken of defendant Coca-Cola on February 15, 2012, the parties discussed at length
6 and all agreed that a meaningful and productive Settlement Conference will require more
7 discovery to be completed by the Defendants and that this discovery and the analysis of the same
8 cannot be completed in sufficient time prior to the March 8, 2012 Settlement Conference date for
9 them to obtain the requisite settlement authority. The parties do not wish to waste the Court's
10 valuable time or the opportunity to engage in a meaningful and productive Settlement
11 Conference. Due to these unforeseen circumstances and the good faith belief, based on
12 Defendants' representations that additional discovery needs to be completed, the parties agree
13 that a March 8, 2012 Settlement Conference date would, in all likelihood, result in an
14 unproductive session.

15 The parties have contacted the clerk for Magistrate Judge Spero and have tentatively
16 calendared April 5, 2012 at 9:00 a.m. as the date for the Settlement Conference, which is the
17 earliest available date on Judge Spero's calendar agreeable to all parties. The parties are
18 confident that sufficient discovery can be completed by April 5, 2012 to give the parties the
19 greatest opportunity at a possible resolution. Therefore, the parties respectfully request that the
20 date for completion of the Mandatory Settlement Conference be continued until April 6, 2012.

21 Pursuant to local rules, this document is being electronically filed through the Court's
22 ECF System. In this regard, counsel for defendant hereby attests that (1) the content of this
23 document is acceptable to all persons required to sign the document; (2) plaintiff's counsel has
24 signed this document; and (3) the signed document is available for inspection upon request.

25 **ALPER & McCULLOCH**

26 DATED: February 22, 2012

27 By: /s/ DEAN ALPER
28 DEAN ALPER
Attorneys for Plaintiff
FARMERS INSURANCE EXCHANGE

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RIMAC MARTIN, P.C.

DATED: February 22, 2012

By: /s/ ANNA M. MARTIN
ANNA M. MARTIN
Attorneys for Defendant
BCI COCA-COLA BOTTLING COMPANY OF
LOS ANGELES (improperly sued herein as THE
COCA-COLA COMPANY)

COZEN O'CONNOR

DATED: February 22, 2012

By: /s/ DAVID BRISCO
DAVID BRISCO
Attorneys for Plaintiff
CNA INSURANCE COMPANY

**WILSON, ELSER, MOSKOWITZ, EDELMAN,
& DICKER**

DATED: February 22, 2012

By: /s/ ERIC S. WONG
ERIC S. WONG
Attorneys for Defendant
TRUE MANUFACTURING

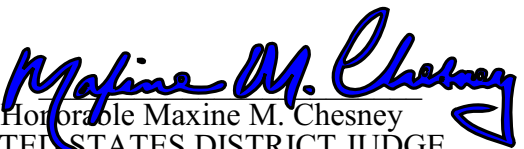
LIBERSON & WOLFORD LLP

DATED: February 22, 2012

By: /s/ JASON N. WOLFORD
JASON N. WOLFORD
Attorneys for Plaintiffs
ABAI ALEMU and ZAFU BELETE

IT IS SO ORDERED:

DATED: February 24, 2012

By: 
The Honorable Maxine M. Chesney
UNITED STATES DISTRICT JUDGE