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7 [Additional Counsel for Plaintiffs appear on signature page]

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 9
 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 WILLIAM AMBROSIO et al.,

13 Plaintiffs,

14 v.

15 CERTAIN UNDERWRITERS AT
 16 LLOYD'S UNDER POLICY NO.
 B0146LDUSA0701030 and DOES 1 through
 17 100, inclusive,

18 Defendants.

CASE NO. 3:11-cv-04956-RS

**JOINT STIPULATED REQUEST FOR
 ORDER ESTABLISHING BRIEFING
 SCHEDULE AND HEARING DATE
 RELATING TO DEFENDANT'S
 MOTIONS TO DISMISS AND MOTIONS
 TO STRIKE**

19
 20 MICHAEL ALVARADO et al.,

21 Plaintiffs,

22 v.

23 CERTAIN UNDERWRITERS AT
 24 LLOYD'S UNDER POLICY NO.
 B0146LDUSA0701030, and DOES 1-100,
 25 inclusive,

26 Defendants.

CASE NO. 3:11-cv-04957-RS

1 WILLIAM JAMISON et al.,

CASE NO. 3:11-cv-04958-RS

2 Plaintiffs,

3 v.

4 CERTAIN UNDERWRITERS AT
5 LLOYD'S UNDER POLICY NO.
6 B0146LDUSA0701030 and DOES 1 through
7 100, inclusive,

8 Defendants.

9 Plaintiffs William Ambrosio et al., Case No. 3:11-cv-04956-RS, by and through their
10 counsel of record, George Donaldson from the Law Office of George Donaldson;

11 Plaintiffs Michael Alvarado, et al., Case No. 3:11-cv-04957-RS, by and through their
12 counsel of record, Jeffrey A. Feldman from the Law Offices of Jeffrey A. Feldman;

13 Plaintiffs William Jamison, et al., Case No. 3:11-cv-04958-RS, by and through their
14 counsel of record, Val Hornstein from the Hornstein Law Offices; and

15 Defendant Brit UW Limited (“Brit”), Case Numbers 3:11-cv-04956-RS, 3:11-cv-04957-
16 RS, 3:11-cv-04958-RS, by and through its counsel of record, Michael L. Fox of Sedgwick LLP,
17 hereby stipulate as follows:
18

19 WHEREAS Defendant Brit has filed Motions to Dismiss pursuant to Federal Rule of Civil
20 Procedure 12(b)(6) with respect to Plaintiffs’ respective Complaints filed in the above captioned
21 cases, which cases were removed from Marin County Superior Court to the United States District
22 Court, Northern District of California, on or about October 7, 2011;

23 WHEREAS Defendant has also filed Motions to Strike pursuant to Federal Rule of Civil
24 Procedure 12(f) with respect to Plaintiffs’ prayer for punitive damages in each of the above
25 referenced cases;
26

27 WHEREAS the parties entered into a Joint Stipulation to Relate Cases as to the following
28

1 matters: *William Ambrosio et al. v. Certain Underwriters at Lloyd's*, Case Number 3:11-cv-
2 04956-RS, *Michael Alvarado, et al. v. Certain Underwriters at Lloyd's*, Case Number 3:11-cv-
3 04957-RS, and *William Jamison, et al. v. Certain Underwriters at Lloyd's*, Case Number 3:11-cv-
4 04958-RS;

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6 WHEREAS the Court has granted the administrative motion to relate these cases, and
7 each of the above referenced cases in now assigned to the Honorable Judge Seeborg;

8 WHEREAS attorneys for Plaintiffs and Defendant in these matters now desire to establish
9 a hearing date relating to Defendants' Motions to Dismiss and Motions to Strike filed in each
10 case, and establish a revised briefing schedule relating thereto, including the filing of a joint
11 opposition by Plaintiffs in order to eliminate unnecessary duplication of labor and cost; and
12

13 WHEREAS there have been no previous time modifications in this case and the
14 Stipulation between the parties will have no effect on the schedule for the case;

15 NOW THEREFORE, IT IS HEREBY STIPULATED by and between the parties that,
16 subject to the Court's approval, the hearing relating to Defendants' Motions to Dismiss and
17 Motions to Strike filed in the three cases will be scheduled for ~~December 15, 2011~~ January 5, 2012 at 1:30 pm;
18 Plaintiffs' joint opposition papers to Defendant's motions will be due ~~November 14, 2011~~ December 5, 2011; and
19 Defendants' Reply papers will be due ~~November 28, 2011~~ December 19, 2011.
20

21
22 DATED: October 24, 2011

LAW OFFICES OF GEORGE DONALDSON

23 By: /s/ George Donaldson
24 George Donaldson
25 Attorneys for *Ambrosio* Plaintiffs
Case No. 3:11-cv-04956-RS

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28 //

1 DATED: October 24, 2011

LAW OFFICES OF JEFFREY A. FELDMAN

2
3 By: /s/ Jeffrey A. Feldman
Jeffrey A. Feldman
Attorneys for *Alvarado* Plaintiffs
4 Case No. 3:11-cv-04957-RS

5
6 DATED: October 24, 2011

HORNSTEIN LAW OFFICES

7
8 By: /s/ Val Hornstein
Val Hornstein
Attorneys for *Jamison* Plaintiffs
9 Case No. 3:11-cv-04958-RS


10
11 DATED: October 24, 2011

SEDGWICK LLP

12
13 By: /s/ Michael L. Fox
Michael L. Fox
Attorneys for Defendant Brit UW Limited
14 (sued as Certain Underwriters at Lloyd's)

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16 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

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18
19 Dated: October 24, 2011



20 Hon. Richard Seeborg, Judge
United States District Court