rosio et	al v. Certain Underwriters at Lloyd's Under Policy	y No. B0146LDUSA0701030	Do
1	Richard S. Miller (SBN 63760) Caroline E. Gegg (SBN 179061) LAW OFFICES OF RICHARD S. MILLER		
2	1600 S. Main Street, Ste. 230 Walnut Creek, California 94596		
3 4	Telephone: (925) 926-0500 Facsimile: (925) 926-0355		
5	Attorneys for Plaintiffs ANDERSON ET AL.		
6	UNITED STATES D	ISTRICT COURT	
7	NORTHERN DISTRIC	CT OF CALIFORNIA	
8 9	WILLIAM AMBROSIO, an individual, <i>et al.</i> ,) 3:11-cv-04956-RS	
10	Plaintiffs,	 JOINT STIPULATION FOR ORDER MODIFYING HEARING DATE AND BRIEFING SCHEDULE RELATING 	
11	v.) BRIEFING SCHEDULE RELATING) TO DEFENDANT'S MOTION TO) DISMISS 	
12 13	CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO.) Judge: Hon. Richard Seeborg.	
13	B0146LDUSA0701030, and DOES 1 through 100, inclusive,)	
15	Defendants.))	
16	WILLIAM JAMISON, et al.,) 3:11-cv-04958-RS	
17	Plaintiffs,	/))	
18	V.	ý))	
19 20	CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO. B0146LDUSA070130, and DOES 1 through 100,)))	
21 22	Defendants.))	
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Stipulation for Order Modifying Hearing Date and Briefing Schedule Relating to Defendant's Motion to Dismiss

1	HENRY JAMES ANDERSON, et al.,)) 3:11-cv-05760-RS
2	Plaintiffs,)
3	V.)
4 5	CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO. B0146LDUSA0701030, and DOES 1-100, inclusive,)))
6 7	Defendants.)))
8 9	ROSEVILLE CAPITAL RESOURCES, LLC et al.,) 4:11-cv-05761-RS
10	Plaintiffs,))
11	v.	
12 13	CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO. B0146LDUSA0701030, and DOES 1-100, inclusive,	
14 15	Defendants.	/))
16	DEAN NOWACKI, et al.,)) 4:11-cv-06366-RS
17	Plaintiffs,)
18 19	V.)
20	CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO. B0146LDUSA0701030, and DOES 1-100,)))
21	inclusive,)
22	Defendants.))
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	- 2 Stipulation for Order Modifying Hearing Date and Brief	2 - ing Schedule Relating to Defendant's Motion to Dismiss

1	OAKDALE HEIGHTS REDDING 1, LLC, <i>et al.</i> ,) 4:11-cv-6368-RS
3	Plaintiffs,)
4	v.)
5	CERTAIN UNDERWRITERS AT LLOYD'S UNDER POLICY NO.)
6	B0146LDUSA0701030, and DOES 1-100, inclusive,)
7	Defendants.)
8	Detendunts.)

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Plaintiffs William Ambrosio, et al., Case Number 3:11-cv-04956-RS, by and through their counsel of record, George Donaldson, Esq. from the Law Office of George Donaldson;

)

Plaintiffs William Jamison, et al., Case Number 3:11-cv-04958-RS, by and through their counsel of record, Val Hornstein, Esq. from the Hornstein Law Offices;

Plaintiffs Henry James Anderson, et al., Case Number 3:11-cv-5760-RS, by and through their counsel of record, Richard S. Miller, Esq. from the Law Offices of Richard S. Miller;

Plaintiffs Roseville Capital Resources, LLC, et al., Case Number 4:11-cv-5761-RS, by and through their counsel of record, Troy A. Thielemann, Esq. from Cappello & Noel LLP;

Plaintiffs Dean G. Nowacki et al., Case No. 4:11-cv-6366-RS, by and through their counsel of record, Patrick Deedon, Esq. from Maire & Burgess; and

Plaintiffs Oakdale Heights Redding, 1, LLC, Case No. 4:11-cv-6368-RS, by and through their counsel of record, Patrick Deedon, Esq. from Maire & Burgess; and

Defendant Brit UW Limited ("Brit"), Case Numbers 3:11-cv-04956-RS; 3:11-cv-04958-RS; 3:11-cv-5760-RS; 4:11-cv-5761-RS; 4:11-cv-6366-RS and 4:11-cv-6368, by and through its counsel of record, Michael L. Fox, Esq. of Sedgwick LLP, hereby stipulate as follows.

Given the critical nature of the pleading, which is a Motion to Dismiss, Plaintiffs believe they need additional time to consider and research the issues. A previous modification occurred in April 2012, when Defendant Brit agreed to Plaintiffs' request for a two week extension of time to file First Amended Complaints, which was effected by the parties entering into a Stipulation and

- 3 -Stipulation for Order Modifying Hearing Date and Briefing Schedule Relating to Defendant's Motion to Dismiss approved in an order by this Court.

Pursuant to Plaintiffs' request for additional time, Plaintiffs and Defendant Brit have agreed to modify the hearing date, which is currently set for June 28, 2012, and the related briefing schedule regarding Defendant Brit's Motion to Dismiss. Therefore, the parties stipulate by and through their counsel of record, subject to the Court's approval, that (1) Plaintiffs shall file and serve their Opposition to Brit's Motion to Dismiss by June 13, 2012; (2) Brit shall file any Reply by June 27, 2012; and (3) the hearing date shall be July 12, 2012, at 1:30 p.m. before the Honorable Richard Seeborg in the above-referenced Court.

This Stipulation will not alter any other date, event or deadline fixed by the Court.

IT SO STIPULATED.

12	DATED: May 24, 2012	SEDGWICK LLP
13		By: <u>/s/ Michael L. Fox</u> Michael L. Fox
14		Michael L. Fox Attorneys for Defendant
15		BRIT UW LIMITED
16		(sued as "Certain Underwriters at Lloyd's Under Policy No. B0146LDUSA701030")
17		-
18	DATED: May 24, 2012	Law Offices of George Donaldson
19		By: <u>/s/ George Donaldson</u> George Donaldson
20		Attorneys for Plaintiffs
21		William Ambrosio, <i>et al.</i> , Case No. 3:11-cv-04956-RS
22		
23	DATED: May 24, 2012	Hornstein Law Offices
24		By: <u>/s/ Val Hornstein</u> Val Hornstein
25		Attorneys for Plaintiffs
26		William Jamison, <i>et al.</i> , Case No. 3:11-cv-04958-RS
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Stipulation for Order Modifying Hearing Date and Briefing Schedule Relating to Defendant's Motion to Dismiss

1	DATED: May 24, 2011	Law Offices of Richard S. Miller
2		By: <u>/s/ Richard S. Miller</u> Richard S. Miller
3		Attorneys for Plaintiffs
4		Henry James Anderson, <i>et al.</i> , Case No. 3:11-cv-5760-RS
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6	DATED: May 24, 2012	Cappello & Noel LLP
7		By: <u>/s/ Troy A. Thielemann</u> Troy A. Thielemann
8		Attorneys for Plaintiffs Roseville Capital Resources, LLC, <i>et al.</i> , Case No. 4:11-cy-5761-RS
9		Case 100. 4.11-CV-3701-KS
10	DATED: May 24, 2012	Maire & Burgess
11		By: <u>/s/ Patrick Deedon</u> Patrick Deedon
12		Attorneys for Dean Nowacki
13		Dean Nowacki et. al Case No. 4:11-cv-6366-RS
14	DATED: May 24, 2012	Maire & Burgess
15		By: /s/ Patrick Deedon
16		Patrick Deedon Attorneys for Plaintiffs
17		Oakdale Heights Redding 1, LLC Case No. 4:11-cv-6368-RS
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19	PURSUANT TO STIPULATION, IT IS SO ORDERED	
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21	DATED. Mar. 25 2012	
22	DATED: May <u>25</u> , 2012	By:
23		U.S. District Judge, Northern District of California
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25 26		
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	Stipulation for Order Modifying Hearing Date and Briefing Schedule Relating to Defendant's Motion to Dismiss	