Stipulation to Apply Court's December 16, 2011 Stay Order

11-CV-5522

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1	UNITED STATES DEPARTMENT OF JUSTICE		
2	Ruth A. Harvey, Assistant Director Frances M. McLaughlin		
3	E. Kathleen Shahan John J. Siemietkowski Trial Attorneys		
4			
5	Civil Division, Commercial Litigation Branch P.O. Box 875, Ben Franklin Station		
6	Washington, DC 20044-0875		
7	Tel: 202-514-3368 Fax: 202-514-9163		
8	John.Siemietkowski@usdoj.gov		
9	Attorneys for Plaintiff		
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION		
12	UNITED STATES OF AMERICA,) Case No. 11-CV-5522 EMC	
13	Plaintiff,) Case No. 11-C v -3322 ENIC))	
14	VS.	STIPULATION TO APPLY COURT'S	
15	GONZALES & GONZALES BONDS AND INSURANCE AGENCY, INC. and	DECEMBER 16, 2011 STAY ORDER	
16	AMERICAN SURETY COMPANY, INC.,		
17	Defendants.))	
18			
19)	
20	Pursuant to Civil L.R. 7-12, Plaintiff United States of America, on the one hand, and		
21	Defendants Gonzales & Gonzales Bonds and Insurance Agency, Inc. and American Surety		
22	Company, Inc. ("G&G/ASC"), on the other hand, by and through their respective counsel of		
23	record, bring this administrative motion by stipulation, and stipulate and agree as follows:		
24	1. Along with the instant case, there are three related cases pending before this Cour		
25	and assigned to Judge Chen: 09-CV-4029, 11-CV-4794, and 11-CV-5231.		
26	2. On December 16, 2011, the Court issued a stay order in 11-CV-4794, dkt. 26, so		
27	that the Court and parties may focus on the be	llwether bonds and issues in 09-CV-4029.	
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1	3. In keeping with this focus, the parties stipulate that the above-referenced stay	
2	order, 11-CV-4794, dkt. 26 (Dec. 16, 2011), shall apply to the instant case as of the date of the	
3	filing of this stipulation.	
4	4. Executing this stipulation does not constitute an admission of liability or waiver of	
5	any rights, remedies, or defenses available to either party in this or any related case.	
6		
7	IT IS SO STIPULATED.	
8	Dated: January 17, 2012	
9	TONY WEST ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP	
10	Assistant Attorney General MELINDA HAAG	
11	United States Attorney	
12	/s/ John J. Siemietkowski /s/ Gary A. Nye	
13	J. CHRISTOPHER KOHN GARY A. NYE RUTH A. HARVEY DAVID R. GINSBURG	
14	E. KATHLEEN SHAHAN Attorneys for Defendants/Counterclaimants	
15	(D.C. Bar No. 267872) GONZALES & GONZALES BONDS AND INSURANCE AGENCY, INC. and AMERICAN	
16	(PA Bar. No. 50346) SURETY COMPANY, INC. FRANCES M. MCLAUGHLIN	
17	(FL Bar No. 0256640) Trial Attorneys	
18	Civil Division, Commercial Litigation	
19	Branch P.O. Box 875, Ben Franklin Station	
20	Washington, DC 20044-0875 Tel: 202-514-3368	
21	Fax: 202-514-9163	
22	John.Siemietkowski@usdoj.gov Attorneys for the United States of	
23	Attorneys for the United States of America	
24		
25	PURSUANT TO STIPULATION, IT IS SO ORDEREDS!	
26	Dated: 1/23/12	
27	EDWARD M. United States II Judge Edward M. Chen	
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	Stipulation to Apply Court's December 16, 2011 Stay Order 2	
	DISTRICT	