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Attorneys for Defendants CENTEX HOMES, a Nevada partnership;  
8 NEWMEYER & DILLION, LLP, a California limited liability partnership  
9

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

12 TRAVELERS PROPERTY CASUALTY  
13 COMPANY OF AMERICA, a Connecticut  
14 corporation,

Plaintiff,

v.

16 CENTEX HOMES, a Nevada partnership;  
17 NEWMEYER & DILLION, LLP, a California  
18 limited liability partnership; RGL, Inc., a  
19 California corporation, dba RGL  
FORENSICS; and DOES 1 through 10  
inclusive,

Defendants.

Case No. 3:12-cv-00371-CRB

[Consolidated for Trial with Case No. 3:13-cv-  
00088-CRB]

Honorable Charles R. Breyer

**STIPULATION TO CONTINUE STATUS  
CONFERENCE AND ORDER AND  
DECLARATION OF JEFFREY M.  
HAYES**

Judge: Hon. Charles R. Breyer  
Date: February 19, 2016  
Time: 8:30 a.m.  
Crtrm.: 6, 17<sup>th</sup> Floor

Trial Date: Not Set

21 AND RELATED CONSOLIDATED CASE  
22

23  
24 **WHEREAS**, Plaintiffs Travelers Property Casualty Company of America and Travelers  
25 Indemnity Company of Connecticut (collectively “Travelers”), Centex Homes (“Centex”),  
26 Newmeyer & Dillion, LLP (“Newmeyer”) and RGL Forensics (“RGL”) appeared before the  
27 Court, through counsel, for a status conference on November 20, 2015.  
28

1           **WHEREAS**, the Court continued the status conference in this action to February 19, 2016,  
2 at 8:30 a.m. to allow Travelers and Centex to attend a mandatory settlement conference being  
3 conducted by the Honorable John Kronstadt, United States District Judge for the Central District  
4 of California, in other pending cases involving Travelers and Centex.

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6           **WHEREAS**, the Court indicated that the parties should file any motions for leave to  
7 reconsider on or before January 31, 2016, and the parties, at the direction of the Court, agreed to  
8 exchange their initial disclosures on January 29, 2016.

9  
10           **WHEREAS**, Travelers and Centex attended the mandatory settlement conference on  
11 January 19, 2016. During the mandatory settlement conference, Travelers and Centex discussed  
12 all of the approximately 80 cases pending between them in California state and federal court.

13  
14           **WHEREAS**, Travelers and Centex did not reach a settlement of all their pending disputes  
15 during the mandatory settlement conference, but did agree to an informal exchange of information  
16 that may help to facilitate a settlement of some, or all, of the disputes between them.

17  
18           **WHEREAS**, Travelers and Centex agreed to attend a continued mandatory settlement  
19 conference, which will be held on February 23, 2016 at 9:00 a.m. before Judge Kronstadt.

20  
21           **WHEREAS**, Travelers, Centex, RGL and Newmeyer believe it would be beneficial for  
22 Travelers and Centex to attend the upcoming continued mandatory settlement conference with  
23 Judge Kronstadt on February 23, 2016, before moving forward with the continued case  
24 management conference in this case, at which the parties anticipate the Court will issue a case  
25 management order.

26  
27           **WHEREAS**, Travelers, Centex, RGL and Newmeyer respectfully request that the Court  
28 continue the upcoming continued status conference in this case for approximately 30 days to

1 March 18, 2016, or another date that is convenient for the Court.  
2

3           **WHEREAS**, Travelers, Centex, RGL and Newmeyer respectfully request that the Court  
4 extend the pending deadlines to exchange initial disclosures and to file motions for leave to  
5 reconsider.  
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7           **IT IS, THEREFORE, STIPULATED** by and between Travelers, Centex, Newmeyer and  
8 RGL that the status conference currently set for February 19, 2016, at 8:30 a.m. be continued to  
9 March 18, 2016, at 8:30 a.m., or another date and time that is convenient for the Court.  
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11           **IT IS FURTHER STIPULATED** by and between Travelers, Centex, Newmeyer and  
12 RGL that the further Case Management Statement will be due on March 11, 2016, or another date  
13 and time that is convenient for the Court.  
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15           **IT IS FURTHER STIPULATED** by and between Travelers, Centex, Newmeyer and  
16 RGL that the deadline to exchange initial disclosures in this case will be March 11, 2016.  
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18           **IT IS FURTHER STIPULATED** by and between Travelers, Centex, Newmeyer and  
19 RGL that the deadline to file motions for leave to reconsider in this case will be February 29, 2016  
20 or any other date after February 29, 2016 that the Court selects.  
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22           **IT IS FURTHER STIPULATED** by and between Travelers, Centex, Newmeyer and  
23 RGL that no party shall file a motion for leave to file a motion for reconsideration until February  
24 29, 2016. However, if the parties receive a signed order from the Court by noon on January 29,  
25 2016, indicating that the deadline to file a motion for leave to file a motion for reconsideration has  
26 been moved from January 31, 2016, to a date after February 29, 2016, the parties mutually agree  
27 not to file any such motion for leave to file a motion for reconsideration until at least February 29,  
28 2016. If the parties receive no such order by noon on January 29, 2016, however, the parties will



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**ORDER**

**PURSUANT TO STIPULATION, IT IS ORDERED** that deadlines in this case be altered as follows:

The status conference currently set for February 19, 2016, at 8:30 a.m. will be continued to March 18, 2016, at 8:30 a.m.;

The Case Management Statement will be due on March 11, 2016;

The deadline to exchange initial disclosures in this case will be March 11, 2016; and

The deadline to file motions for leave to reconsider in this case will be February 29, 2016.

Dated: February 1, 2016



Hon. Charles R. Breyer  
Judge, United States District Court