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 Infrastructure, Inc.

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

12 AMEC ENVIRONMENT &  
 INFRASTRUCTURE, INC.,  
 13  
 Plaintiff,  
 14  
 v.  
 15  
 INTEGRAL CONSULTING, INC.,  
 16 EDWARD P. CONTI, an individual,  
 MATTHEW HILLYARD, an individual, and  
 17 DAVID AVERILL, an individual,  
 18  
 Defendants.

Case No. CV 12-01735 SC (NC)  
**NOTICE OF SETTLEMENT AND  
 STIPULATION AND ORDER TO  
 CONTINUE DISCOVERY DEADLINE  
 AND DISPOSITIVE MOTION DEADLINE  
 TO FINALIZE SETTLEMENT  
 AGREEMENT**

1 WHEREAS, on May 6, 2015, the parties agreed to a settlement of this case and a related  
2 coverage case pending in the United States District Court for the Western District of Washington;

3 WHEREAS, the parties are in the process of finalizing a formal settlement agreement,  
4 which they expect to be completed within two weeks;

5 WHEREAS, discovery presently closes on May 29, 2015, and the Court recently ordered  
6 AMEC to produce additional documents by May 27, 2015;

7 WHEREAS, the dispositive motion hearing deadline is presently set for June 26, 2015  
8 requiring such motion to be filed by May 22, 2015.

9 WHEREAS, to finalize the settlement agreement, the parties have agreed to a mutual stay  
10 of all discovery and litigation in this action, and have agreed to continue all document productions  
11 and depositions to June 2015;

12 WHEREAS, the parties have agreed to a 30-day continuance of the discovery deadline and  
13 a continuance of the dispositive motion hearing deadline to July 31, 2015 to allow the parties to  
14 finalize the terms of the settlement agreement;

15 WHEREAS, in the event the parties are not able to finalize the formal settlement  
16 agreement within two weeks, the parties reserve the right to seek further continuances from the  
17 Court of discovery and other scheduled dates if the circumstances require it for good cause.

18 WHEREAS the parties request that the Court enter an order allowing for a 30-day  
19 continuance for the close of discovery to allow the parties to finalize the settlement agreement  
20 such that all discovery will close on June 29, 2015;

21 WHEREAS, the parties request that the dispositive motion hearing deadline presently set  
22 for June 26, 2015, be vacated and re-set for July 31, 2015, in accordance with the continuance of  
23 the discovery cutoff.

24 NOW THEREFORE, IT IS HEREBY STIPULATED by and between the parties hereto  
25 through their respective attorneys of record as follows:

26 The parties stipulate to continue the close of discovery in this case to June 29, 2015 and  
27  
28

1 that the dispositive motion hearing deadline presently set for June 26, 2015, be vacated and re-set  
2 for July 31, 2015.

3 IT IS SO STIPULATED.

4 Dated: May 21, 2015.

CARROLL, BURDICK & McDONOUGH LLP

5 By           /s/Robert J. Nolan            
6 Robert J. Nolan  
7 Attorneys for Plaintiff AMEC Environment &  
Infrastructure, Inc.

8 Dated: May 21, 2015.

LEWIS, BRISBOIS, BISGAARD & SMITH LLP

9 By           /s/Leo Bautista            
10 Leo Bautista  
11 Attorneys for Defendant Integral Consulting, Inc.

12 Dated: May 21, 2015.

BURNHAM BROWN

13 By           /s/Brendan Brownfield            
14 Brendan Brownfield  
15 Attorneys for Defendants Edward P. Conti and  
Matthew Hillyard and David Averill

16 I, Robert Nolan, hereby attest that I have the concurrence of the above counsel in the filing  
17 of this document.

18 **ORDER**

19 PURSUANT TO STIPULATION, IT IS HEREBY ORDERED the close of discovery in  
20 this action is continued to June 29, 2015, and that the dispositive motion hearing deadline  
21 presently set for June 26, 2015, is vacated and re-set to July 31, 2015 to allow the parties time to  
22 finalize the settlement agreement.

23 IT IS SO ORDERED.

24 DATED:

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