

1 JOHN F. FRIEDEMANN (SBN 115632)  
*jfriedemann@frigolaw.com*  
 2 KYLE M. FISHER (SBN 127334)  
*kfisher@frigolaw.com*  
 3 MARCI A. REICHBACH (SBN 215545)  
*mreichbach@frigolaw.com*  
 4 FRIEDEMANN GOLDBERG LLP  
 420 Aviation Boulevard, Suite 201  
 5 Santa Rosa, California 95403  
 Telephone: (707) 543-4900  
 6 Facsimile: (707) 543-4910

7 Attorneys for Plaintiffs  
 DAVID RAFANELLI, PATRICIA RAFANELLI,  
 8 A. RAFANELLI WINERY & VINEYARDS  
 LIMITED PARTNERSHIP dba A. RAFANELLI  
 9 WINERY & VINEYARDS, RAFANELLI MANAGEMENT  
 LLC, RASHELL L. RAFANELLI-FEHLMAN  
 10 and RLF MANAGEMENT LLC

11  
 12 UNITED STATES DISTRICT COURT  
 13 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 14

15 DAVID RAFANELLI, an individual; PATRICIA  
 RAFANELLI, an individual; A. RAFANELLI  
 16 WINERY & VINEYARDS LIMITED  
 PARTNERSHIP dba A. RAFANELLI WINERY  
 17 & VINEYARDS, a California limited  
 partnership; RAFANELLI MANAGEMENT  
 18 LLC, a California limited liability company;  
 RASHELL L. RAFANELLI-FEHLMAN an  
 19 individual; and RLF MANAGEMENT LLC, a  
 California limited liability company;  
 20  
 Plaintiffs,  
 21  
 vs.  
 22 TRAVELERS PROPERTY CASUALTY  
 23 COMPANY OF AMERICA, a Connecticut  
 corporation,  
 24  
 Defendant.  
 25

Case No. 3:12-cv-04141-SC

**NOTICE OF SETTLEMENT OF ENTIRE  
 CASE AND STIPULATION AND  
~~PROPOSED~~ ORDER VACATING  
 MOTION HEARING DATE**

**Assigned To: Hon. Samuel Conti**

**Trial Date: Not Set**

1           **TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR**  
2 **ATTORNEYS OF RECORD:**

3           **PLEASE TAKE NOTICE** that on or about December 20, 2012 Plaintiffs David  
4 Rafanelli, Patricia Rafanelli, A. Rafanelli Winery & Vineyards Limited Partnership dba A.  
5 Rafanelli Winery & Vineyards, Rafanelli Management LLC, Rashell L. Rafanelli-Fehlman and  
6 RLF Management LLC (collectively "Rafanelli") and Defendant Travelers Property Casualty  
7 Company of America ("Travelers") (together the "Parties") agreed to the terms of a conditional  
8 settlement.

9           This stipulation is entered into by the Parties by and through their respective counsel of  
10 record.

11  
12   **FACTUAL RECITALS**

13           This Stipulation is entered into in reference to the following facts:

- 14           1.       The initial pleading in this case was filed on August 6, 2012.
- 15           2.       The Parties have pending motions for summary judgment set for hearing on  
16                January 11, 2012 which the Parties wish to withdraw.
- 17           3.       The Parties anticipate that it will take 30 days to finalize the settlement agreement  
18                and for Travelers to satisfactorily complete the terms of the settlement.
- 19           4.       The Parties anticipate that they will be able to file a stipulation of dismissal within  
20                approximately 45 days.

21       ///

22       ///

23       ///

24       ///

25       ///

26       ///

27       ///

28       ///

1 **STIPULATION**

2 In light of the foregoing facts, the Parties agree as follows:

- 3 1. The hearing date on the motions for summary judgment scheduled for January 11,  
4 2013 shall be vacated.

5  
6 **SO STIPULATED.**

7  
8 DATED: December 21, 2012 FRIEDEMANN GOLDBERG LLP

9  
10 By: /s/ Marci A. Reichbach  
11 MARCI A. REICHBACH  
12 Attorneys for Plaintiffs  
13 DAVID RAFANELLI, PATRICIA RAFANELLI, A.  
14 RAFANELLI WINERY & VINEYARDS LIMITED  
15 PARTNERSHIP dba A. RAFANELLI WINERY &  
16 VINEYARDS, RAFANELLI MANAGEMENT LLC,  
17 RASHELL L. RAFANELLI-FEHLMAN and RLF  
18 MANAGEMENT LLC

19  
20 DATED: December 21, 2012 SEDGWICK LLP

21  
22 By: /s/ Nicholas J. Boos  
23 NICHOLAS J. BOOS  
24 Attorneys for Defendant  
25 TRAVELERS PROPERTY CASUALTY COMPANY  
26 OF AMERICA

27 *Filer's Attestation: Pursuant to Civil Local Rule 5-1 (i)(3) regarding signatures, Marci A.  
28 Reichbach hereby attests that concurrence in the filing of this document has been obtained.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

29 DATED: December 28, 2012

30   
31 **UNITED STATES DISTRICT COURT JUDGE**