

THE AGUILERA LAW GROUP, APLC

A. Eric Aguilera (SBN 192019)
Kimberly R. Arnal (SBN 200448)
650 Town Center Drive, Suite 100
Costa Mesa, CA 92626
eaguilera@aguileragroup.com
karnal@aguileragroup.com
T: 714.384.6600 / F: 714.384.6601

Attorneys for Plaintiffs ST. PAUL FIRE AND MARINE INSURANCE COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

ST. PAUL FIRE AND MARINE
INSURANCE COMPANY, a Minnesota
corporation

Plaintiff,

v.

ADMIRAL INSURANCE COMPANY,
a Delaware corporation, et al.,

Defendants.

Case No. 3:12-cv-04160-JST
**Honorable Jon S. Tigar – Courtroom
9**

**STIPULATION TO AMEND CASE
MANAGEMENT ORDER AND
CONTINUE CERTAIN DATES**

WHEREAS, several of the parties to this action are actively participating in settlement discussions;

WHEREAS, the parties believe that continuing the dates for the remaining permissible fact discovery by 40 days will facilitate settlement discussions;

WHEREAS, continuing the discovery fact cut-off date necessitates the continuing certain other dates;

WHEREAS, on November 20, 2013, the trial court in the Underlying Action entitled STRS Ohio CA Real Estate Investment I, LLC v. ACCO Engineering Systems,

1 Inc., et al., Alameda Superior Court Case Number RG10-496973 (“Underlying
2 Action”) continued the trial date of that action to February 3, 2014.

3 **WHEREAS**, the parties to the Underlying Action continue to take expert
4 depositions up to and including this week and the parties to the instant action
5 anticipate that discovery in the Underlying Action will be relevant to resolution of
6 this matter, the Parties request that the Court modify the Scheduling Order and
7 continue the fact discovery deadline by 40-day.

8 **IT IS HEREBY STIPULATED** by and between St. Paul and Defendants
9 who remain in this action, by and through their designated counsel, and subject to the
10 approval of this Court, to amend the Case Management Order as follows:

EVENT	DEADLINE
Fact discovery cut-off	3/14/14
Expert disclosures	3/28/14
Expert rebuttal	4/11/14
Expert discovery cut-off	5/2/14
Deadline for Filing Dispositive Motions	5/23/14
Pretrial conference statement due	7/8/14
Pretrial conference	7/18/14 at 2:00 pm
Trial	8/4/14 at 8:30 am
Estimate of trial length (in days)	3

23
24 Dated: January 17, 2014 **THE AGUILERA LAW GROUP, APLC**

25 /s/ Kimberly R. Arnal

26 A. Eric Aguilera
27 Kimberly R. Arnal
28 Attorneys for Plaintiff ST. PAUL FIRE AND
MARINE INSURANCE COMPANY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: January 17, 2014

BOORNAZIAN, JENSEN & GARTHE

/s/ Alan E. Swerdlow
Alan E. Swerdlow
Attorneys for Defendant AMERICAN SAFETY
INDEMNITY COMPANY

Dated: January 17, 2014

SELVIN WRAITH HALMAN LLP

/s/ Gary Selvin
Gary Selvin
Norman Lau
Attorneys for Defendant LEXINGTON
INSURANCE COMPANY, NATIONAL UNION
FIRE INSURANCE COMPANY OF PITTSBURGH,
PA

Dated: January 17, 2014

**COLLIAU CARLUCCIO KEENER MORROW
PETERSON & PARSONS**

/s/ Kevin M. Haithcox
Kevin M. Haithcox
Attorney for Defendants NATIONAL FIRE
INSURANCE COMPANY OF HARTFORD (ON
ITS OWN BEHALF AND AS SUCCESSOR BY
MERGER TO TRANSCONTINENTAL
INSURANCE COMPANY), VALLEY FORGE
INSURANCE COMPANY, TRANSPORTATION
INSURANCE COMPANY, CONTINENTAL
CASUALTY COMPANY and THE
CONTINENTAL INSURANCE COMPANY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: January 17, 2014 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

 /s/ Kathleen E. Hegen
Kathleen E. Hegen
Attorney for Defendant ADMIRAL INSURANCE
COMPANY

Dated: January 17, 2014 **SINNOTT, PUEBLA, CAMPAGNE & CURET**

 /s/ Blaise S. Curet
Blaise S. Curet
Randy M. Marmor
Attorney for Defendant ZURICH AMERICAN
INSURANCE COMPANY

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED,

DATED: January 17, 2014

 Jon S. Tigar
Honorable Jon S. Tigar