

1 LEONIDOU & ROSIN
Professional Corporation
2 Janette G. Leonidou (No. 155257)
3 Roger F. Liu (No. 218345)
777 Cuesta Drive, Suite 200
4 Mountain View, CA 94040
Telephone: (650) 691-2888
5 jleonidou@alr-law.com
rliu@alr-law.com
6

7 Attorneys for Counter-Defendant/
Counter-Claimant C.E. Toland & Son
8

9 IN THE UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 TECNOGLASS, S.A., a Colombian
12 Corporation.

13 Plaintiff,

14 vs.

15 MOOS DISTRIBUTION, INC., dba SADEV)
16 USA, a Iowa corporation, WEBCOR)
CONSTRUCTION, LP dba Webcor Builders,)
17 a California limited partnership, SAFECO)
18 INSURANCE COMPANY OF AMERICA, a)
New Hampshire corporation, CITY &)
19 COUNTY OF SAN FRANCISCO, PUBLIC)
UTILITY COMMISSION; THE)
20 INSURANCE COMPANY OF THE STATE)
OF PENNSYLVANIA, a Pennsylvania)
21 corporation,)

22 Defendants.)

23 MOOS DISTRIBUTION, INC., dba SADEV)
24 USA, a Iowa corporation,)

25 Counter-claimant,)

26 vs.)

27 C.E. TOLAND & SON, a California)
28 corporation, WEBCOR CONSTRUCTION,)

Case No.: C-13-01031 JST

**STIPULATION AND ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE**

1 LP dba Webcor Builders, a California limited)
partnership, TECNOGLASS, S.A. a)
2 Colombian Corporation, SAFECO)
INSURANCE COMPANY OF AMERICA, a)
3 New Hampshire corporation, THE)
INSURANCE COMPANY OF THE STATE)
4 OF PENNSYLVANIA, a Pennsylvania)
corporation.)

5)
6 Counter-defendants.)

7)
8 C.E. TOLAND & SON, a California)
corporation,)

9 Counter-claimant,)

10 vs.)

11)
12 MOOS DISTRIBUTION, INC., dba SADEV)
USA, a purported Iowa corporation; MOES 1)
13 through 10.)

14 Counter-defendants.)
15)

16 **RECITALS**

17 Plaintiff Tecnoglass, S.A. (“Tecnoglass”), Defendant/Counter-Claimant Moos
18 Distributing, Inc. d/b/a Sadev USA (“Sadev”), Counter-Defendant and Counter-Claimant C.E.
19 Toland & Son (“Toland”), Defendants and Counter-Defendants Webcor Construction, LP d/b/a
20 Webcor Builders (“Webcor”), Safeco Insurance Company of America (“Safeco”), Insurance
21 Company of the State of Pennsylvania (“ICSP”), and Defendant Fidelity and Deposit Company
22 of Maryland (“Fidelity”), by and through their counsel of record, hereby stipulate as follows:

23 **Whereas**, the parties completed mediation on November 21, 2013, whereby a conditional
24 settlement of the entire case was reached that is still contingent upon the agreement on and
25 execution of an amenable settlement agreement;

26 **Whereas**, a further case management conference is set for December 18, 2013, for which
27 the parties have submitted or will be submitting to the court a report regarding, among other
28 issues, the conditional settlement and status thereof;

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

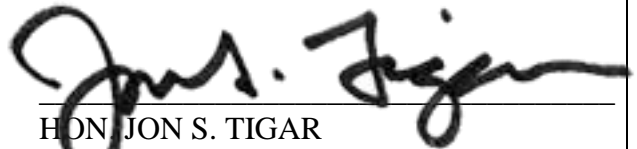
ORDER

The Court, having reviewed and considered the above Stipulation of the parties, and for good cause appearing, hereby orders that the case management conference set for December 18, 2013 is hereby vacated and continued sixty (60) days in light of the conditional settlement of the entire case reached by the parties. A further case management conference is to take place on February 26, 2014 to report on the status of the settlement.

The parties are reminded that all existing deadlines remain in effect.

IT IS SO ORDERED

Dated: December 5, 2013



HON. JON S. TIGAR
United States District Court Judge