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11	UNITED STATES DISTRICT COURT		
12	NORTHERN DISTRICT OF CALIFORNIA		
13	SAN FRANCISCO DIVISION		
15	CHARTIS SPECIALTY INSURANCE	Case No. CV-13-01527-EMC	
16	COMPANY, an Illinois corporation, for itself) and as subrogee of Whittaker Corporation;	Honorable Edward M. Chen	
17	and WHITTAKER CORPORATION, a  Delaware corporation,	[PROPOSED] STIPULATED ORDER EXTENDING	
18	Plaintiff,	WHITTAKER'S DEADLINE TO RESPOND FOR ALL PENDING	
19	vs.	DISCOVERY AND DEFENDANT U.S.A.'S DEADLINE TO SEEK	
20	UNITED STATES OF AMERICA,	DISCOVERY RELIEF THERETO	
21	Defendant.		
22	)		
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28		(DDODOCED) CTIMIL ATER ORDER SYMPHING	
	602647423v1 - 1 -	[PROPOSED] STIPULATED ORDER EXTENDING WHITTAKER'S DEADLINE TO RESPOND AND U.S.A.'S DEADLINE TO SEEK DISCOVERY RELIEF Case No. CV-13-01527-EMC	

## **STIPULATION**

Plaintiff Whittaker Corporation ("Whittaker") and Defendant United States of America				
(collectively the "Parties") hereby enter into this stipulation ("Stipulation") and agree that				
Whittaker's deadline to respond to Defendant's pending written discovery requests will be				
extended to Monday, June 8, 2015. The currently pending discovery requests encompassed by				
this stipulation are: Defendant's Second Set of Requests for Admission to Plaintiff Whittaker				
Corporation served on April 24, 2015, Defendant's Third Set of Requests for Admission to				
Plaintiff Whittaker Corporation served on April 29, 2015, Defendant's Third Set of Requests for				
Production to Plaintiff Whittaker Corporation served on April 29, 2015, and Defendant's Third				
Set of Interrogatories to Plaintiff Whittaker Corporation served on April 29, 2015 (collectively,				
"Covered Discovery").				

Because this extension will result in service of Whittaker's responses to the Covered Discovery being served after the May 29, 2015 fact discovery cut-off, to accommodate Local Rule Civ. 37-3, the Parties agree and seek Court approval to extend Defendant's deadline to seek discovery relief from the Court pursuant to Judge Chen's Civil Standing Order on Discovery until seven (7) days after Whittaker serves its responses, or until June 15, 2015.

NOW, THEREFORE, the Parties stipulate, by and through their undersigned counsel of record, as follows:

- 1. Whittaker shall respond to the Covered Discovery no later than June 8, 2015, and
- 2. Defendant may seek any necessary discovery relief from the Court pursuant to Judge Chen's Civil Standing Order on Discovery no later than seven (7) days after Plaintiff serves its responses, or no later than June 15, 2015.

24 IT IS SO STIPULATED:

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[PROPOSED] STIPULATED ORDER EXTENDING WHITTAKER'S DEADLINE TO RESPOND AND U.S.A.'S DEADLINE TO SEEK DISCOVERY RELIEF Case No. CV-13-01527-EMC

1	Dated: May 26, 2015.	
2		PILLSBURY WINTHROP SHAW PITTMAN LLP
3		MARK E. ELLIOTT 725 South Figueroa Street, Suite 2800
4		Los Angeles, CA 90017-5406
5		D //// / D DU:
6		By: /s/ Mark E. Elliott  Mark E. Elliott
7		Attorneys for Plaintiff WHITTAKER CORPORATION
8	Dated: May 26, 2015.	
9	, , , , ,	U.S. DEPARTMENT OF JUSTICE,
10		ENVIRONMENTAL DEFENSE SECTION C. SCOTT SPEAR
11		P.O. Box 7611
12		Washington, D.C. 20044
13		By: /s/ C. Scott Spear
14		C. Scott Spear Attorneys for Defendant
15		UNITED STATES OF AMERICA
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## PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May \_\_\_\_, 2015

