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17 Attorneys for Plaintiff  
 18 Chartis Specialty Insurance Company

19 **UNITED STATES DISTRICT COURT**  
 20 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 21 **SAN FRANCISCO DIVISION**

22 \_\_\_\_\_ )  
 23 CHARTIS SPECIALTY INSURANCE )  
 24 COMPANY, an Illinois corporation, for )  
 25 itself and as subrogee of Whittaker )  
 26 Corporation; and WHITTAKER )  
 27 CORPORATION, a Delaware corporation, )  
 28 *Plaintiffs,* )  
 v. )  
 UNITED STATES OF AMERICA, )  
*Defendant.* )

Case No. CV-13-01527-EMC (MEJ)  
**~~PROPOSED~~ STIPULATED  
 ORDER EXTENDING CHARTIS  
 SPECIALTY INSURANCE  
 COMPANY'S DEADLINE TO  
 RESPOND TO ALL PENDING  
 DISCOVERY AND DEFENDANT  
 UNITED STATES OF AMERICA'S  
 DEADLINE TO SEEK DISCOVERY  
 RELIEF**

**STIPULATION**

1  
2 Plaintiff Chartis Specialty Insurance Company, n/k/a AIG Specialty Insurance Company  
3 (“AIG Specialty”), and Defendant United States of America (collectively, the “Parties”) hereby  
4 enter into this stipulation (“Stipulation”) and agree that AIG Specialty’s deadline to respond to  
5 Defendant’s pending written discovery requests will be extended to Friday, June 12, 2015. The  
6 currently pending discovery requests encompassed by this stipulation are: Defendant United  
7 States of America’s Second Request for Production of Documents Directed to Plaintiff AIG  
8 Specialty Insurance Company f/k/a Chartis Specialty Insurance Company served on April 29,  
9 2015, and Defendant United States of America’s Interrogatories Directed to Plaintiff AIG  
10 Specialty Insurance Company f/k/a Chartis Specialty Insurance Company served on April 29,  
11 2015 (collectively, “Pending Discovery”).

12 Because this extension will result in AIG Specialty’s response to the Pending Discovery  
13 being served after the May 29, 2015 fact discovery cut-off date, to accommodate Local Rule Civ.  
14 37-3, the Parties agree and seek Court approval to extend Defendant’s deadline to seek discovery  
15 relief from the Court pursuant to Judge Chen’s Civil Standing Order on Discovery until seven (7)  
16 days after AIG Specialty serves its responses, or until June 19, 2015.

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

- 19 1. AIG Specialty shall respond to the Pending Discovery no later than June 12,  
20 2015, and
- 21 2. Defendant may seek any necessary discovery relief from the Court pursuant to  
22 Judge Chen’s Civil Standing Order on Discovery no later than seven (7) days after Plaintiff  
23 serves its responses, or no later than June 19, 2015.

24 IT IS SO STIPULATED:  
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Dated: May 27, 2015

GARDERE WYNNE SEWELL LLP

By: /s/ Matthew J. Schroeder  
Matthew J. Schroeder  
Attorneys for Plaintiff AIG SPECIALTY SPECIALTY  
INSURANCE COMPANY

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1 Dated: May 27, 2015

U.S. DEPARTMENT OF JUSTICE,  
ENVIRONMENTAL DEFENSE SECTION

2  
3  
4 By: /s/ C. Scott Spear

C. Scott Spear

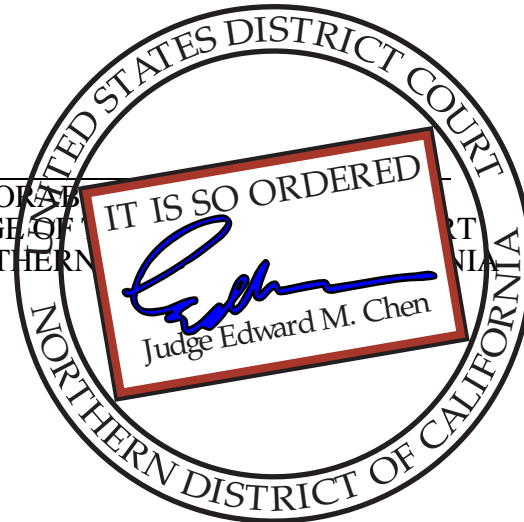
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16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17 Dated May 27, 2015

18  
19 HONORABLE  
20 JUDGE OF  
21 NORTHERN



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