JOINT STIPULATION TO EXTEND DEADLINE TO SERVE RULE 26(A) INITIAL DISCLOSURES; [PROPOSED] ORDER

JOINT STIPULATION TO EXTEND DEADLINE

TO SERVE DITLE 26 DISCLOSURES

2	TO SERVE RULE 26 DISCLOSURES		
3	This stipulation is entered into by Plaintiffs Chartis Specialty Insurance Company		
4	("Chartis") and Whittaker Corporation ("Whittaker"), and Defendant United States of America		
5	("United States") (collectively, the "Parties") to extend the deadline to serve Rule 26(a) initial		
6	disclosures. On July 2, 2013, the Parties held their Federal Rule 26(f) conference in advance of		
7	the currently-scheduled July 25, 2013 Case Management Conference. Because of the July 4		
8	holiday and the time involved with the parties' cooperative efforts to prepare the required Joint		
9	Case Management Statement due on July 18, 2013, the Parties agreed and stipulated during the		
10	July 2nd conference that they would have through and until July 23, 2013 to make their respective		
11	Rule 26(a) initial disclosures. Accordingly, the Parties ask the Court to enter the proposed Order		
12	submitted herewith granting such relief.		
13	DATED: July 16, 2013	GARDERE WYNNE SEWELL LLP	
14			
15]	By: /s/ Matthew J. Schroeder Matthew J. Schroeder	
16		Attorneys for Plaintiff, CHARTIS SPECIALTY	
17		INSURANCE COMPANY	
18	DATED: July 16, 2013	PILLSBURY WINTHROP SHAW PITTMAN LLP	
19			
20		By: /c/ Stacay C Wright	

By: /s/ Stacey C. Wright Stacey C. Wright Attorneys for Plaintiff, WHITTAKER CORPORATION

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3:13-CV-01527-EMC

1	DATED: July 16, 2013	ROBERT G. DREHER Acting Assistant Attorney	General
2		Environment & Natural Ro	esources Division
3			
4		By: /s/ C. Scott Spear	
5		Michael C. Aug John Thomas H.	Do
6		C. Scott Spear Attorneys for Defendant, U	JNITED STATES OF
7		AMERICA	
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[PROPOSED] ORDER

The Court has considered the Parties' Joint Stipulation to Extend Deadline to Serve Rule 26(a) Disclosures and, finding good cause, hereby orders that the deadline for the Parties to serve their Rule 26(a) initial disclosures shall be July 23, 2013.

IT IS SO ORDERED.

Dated: 7/18/13

IT IS SO ORDERED trict Judge

Judge Edward M. Chen

Judge Edward M. Chen