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27 **UNITED STATES DISTRICT COURT**
 28 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

29 PARKLYN BAY COMPANY, LLC,
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 31 Plaintiff,
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 33 v.
 34 LIBERTY SURPLUS INSURANCE
 35 CORPORATION,
 36
 37 Defendant.

Case No. 3:13-cv-03124-EMC

**JOINT NOTICE OF SETTLEMENT &
 REQUEST TO STAY ALL DISCOVERY
 & PRE-TRIAL DEADLINES 45 DAYS**

Courtroom: 5
 Hon. Edward M. Chen

1 Plaintiff PARKLYN BAY COMPANY, LLC ("Parklyn" or "Plaintiff") and Defendant
2 LIBERTY SURPLUS INSURANCE CORPORATION ("LSIC" or "Defendant") (collectively
3 "Parties") jointly submit this Notice of Settlement & Request For Stay.

4 The Parties have agreed to a form of settlement agreement for a full and complete
5 settlement of this case, which has been signed by Plaintiff and which counsel for Defendant
6 believes will be signed later this week. Upon Defendant's signature, the funds must be paid within
7 thirty (30) days, at which time a Stipulated Request for Dismissal will be filed.

8 The Parties therefore request that the Court stay this case, including any and all
9 discovery and pre-trial deadlines, for at least forty five (45) days.

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Dated: April 12, 2016

HANSON BRIDGETT LLP

By: /s/ Alexander J. Berline
Alexander J. Berline
Attorneys for PARKLYN BAY COMPANY, LLC

Dated: April 12, 2016

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By: /s/ Patrick Fredette
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Timothy R. Sullivan
Attorneys for LIBERTY SURPLUS INSURANCE
CORPORATION

IT IS SO ORDERED:

Edward M. Chen
U.S. District Judge

