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Insurance Company

7
 8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10
 11 **TRICOR AMERICA, INC., a**
 California corporation,

12 **Plaintiff,**

13 **vs.**

14 **FEDERAL INSURANCE COMPANY,**
 15 a corporation; and DOES 1 through 50,
 16 inclusive,

17 **Defendants.**

Case No. 3:13-cv-03391-JST

**STIPULATION FOR LEAVE TO
 FILE A THIRD PARTY
 COMPLAINT; [PROPOSED]
 ORDER THEREON**

Trial Date: None

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18
 19 **WHEREAS,** at issue in this lawsuit is a claim presented by plaintiff, Tricor
 20 America, Inc. (“Tricor”), to defendant, Federal Insurance Company, (“Federal”)
 21 arising out of the alleged wrongdoing of Mike Chung (“Chung”), a former employee
 22 of Tricor, and

23 **WHEREAS,** pursuant to the insurance policy at issue in this lawsuit, Federal
 24 is subrogated to the rights of Tricor against Chung to the extent of the payments
 25 made by Federal under the insurance policy it issued to Tricor; and

26 **WHEREAS,** the causes of action sought to be asserted by Federal against
 27 Chung arise out of the same nucleus of operative facts at issue in the underlying
 28 complaint;

1 NOW THEREFORE, the parties hereto, through their respective counsel,
2 stipulate and agree that Federal should be granted leave to file a Third Party
3 Complaint against Chung.

4
5 DATED: October 3, 2013 LAW OFFICES OF LAURA NGUYEN
6 /s/ Laura Nguyen
7 By: _____
8 Laura Nguyen
9 Attorneys for Plaintiff Tricor America, Inc.

10
11 DATED: October 3, 2013 ANDERSON, MCPHARLIN & CONNERS LLP
12 /s/ Henry S. Zangwill
13 By: _____
14 David T. DiBiase
15 Henry S. Zangwill
16 Attorneys for Defendant, Federal Insurance
17 Company

18 **ORDER**

19 GOOD CAUSE APPEARING THEREFOR, defendant Federal Insurance
20 Company is granted leave to file a Third Party Complaint against Mike Chung.

21 DATED: October 4, 2013

