

1 Brandt L. Wolkin, Esq., SBN 112220  
 Dawn A. Silberstein, Esq., SBN 167936  
 2 Jennifer L. Elowsky, Esq., SBN 230739  
 WOLKIN · CURRAN, LLP  
 3 555 Montgomery Street, Suite 1100  
 San Francisco, California 94111  
 4 Telephone: (415) 982-9390  
 Facsimile: (415) 982-4328

5 Attorneys for Plaintiff,  
 6 NAVIGATORS SPECIALTY INSURANCE COMPANY

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10  
 11 NAVIGATORS SPECIALTY INSURANCE  
 COMPANY,

12 Plaintiff,

13 vs.  
 14

15 ST. PAUL SURPLUS LINES INSURANCE  
 16 COMPANY, LIBERTY SURPLUS INSURANCE  
 CORPORATION, TRAVELERS PROPERTY  
 17 CASUALTY COMPANY OF AMERICA,  
 NORTH AMERICAN CAPACITY INSURANCE  
 18 COMPANY. and DOES 1 through 100, inclusive,

19 Defendants.

Case No. 3:13-cv-03499 SC

**STIPULATION AND [PROPOSED]  
 ORDER: DISMISSING TRAVELERS  
 PROPERTY CASUALTY COMPANY OF  
 AMERICA WITH PREJUDICE IN  
 EXCHANGE FOR WAIVER OF COSTS**

20  
 21  
 22 Pursuant to Federal Rule of Civil Procedure 41(a)(2) and Local Rules 7-12 and 77-2,  
 23 NAVIGATORS SPECIALTY INSURANCE COMPANY (“Navigators”) and TRAVELERS  
 24 PROPERTY CASUALTY COMPANY OF AMERICA (“Travelers”) stipulate to the dismissal with  
 25 prejudice of Navigators’ operative complaint as to Travelers only. Travelers and Navigators further  
 26 stipulate that each party shall bear its own attorney fees and costs.

27 IT IS SO STIPULATED:

28 ///

1 Dated: April 6, 2015

WOLKIN • CURRAN, LLP

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*/s/ Dawn A. Silberstein*

By: \_\_\_\_\_  
Brandt L. Wolkin  
Dawn A. Silberstein

Attorneys for Plaintiff,  
**NAVIGATORS SPECIALTY  
INSURANCE COMPANY**

Dated: April 6, 2015

THE AGUILERA LAW GROUP

*/s/ Thomas V. Perea*

By: \_\_\_\_\_  
Thomas V. Perea

Attorneys for Defendants,  
**ST. PAUL SURPLUS LINES  
INSURANCE COMPANY and TRAVELERS  
PROPERTY CASUALTY COMPANY OF  
AMERICA**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SIGNATURE ATTESTATION**

I hereby attest that I have authorization to sign on behalf of counsel whose signatures are indicated by a conformed signature (/s/) within this e-filed document.

Dated: April 6, 2015

WOLKIN • CURRAN, LLP

*/s/ Dawn A. Silberstein*

By: \_\_\_\_\_

Brandt L. Wolkin  
Dawn A. Silberstein  
Jennifer L. Elowsky

Attorneys for Plaintiff,  
**NAVIGATORS SPECIALTY  
INSURANCE COMPANY**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 15, 2015



\_\_\_\_\_  
The Honorable Senior Judge Samuel Conti,  
United States District Court, Northern District of California