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 COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ILLINOIS UNION INSURANCE
 COMPANY, an Illinois corporation

Plaintiff,

v.

INTUITIVE SURGICAL, INC., a
 Delaware corporation,

Defendant.

Case No.: 3:13-cv-04863-JST

**STIPULATION AND ~~PROPOSED~~ ORDER
 AFFIRMING APPLICATION OF
 PROTECTIVE ORDER TO IRONSHORE
 SPECIALTY INSURANCE**

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NAVIGATORS SPECIALTY
INSURANCE COMPANY, a Delaware
corporation

Plaintiff,

v.

INTUITIVE SURGICAL, INC., a
Delaware corporation,

Defendant.

Case No.: 3:13-cv-005801-JST

INTUITIVE SURGICAL INC., a Delaware
corporation

Cross-Complainant,

v.

IRONSHORE SPECIALTY INSURANCE
COMPANY, an Arizona corporation,

Cross-Defendant.

Case No.: 3:13-cv-04863-JST

Judge: Honorable J. Tigar

WHEREAS, on July 18, 2014, the Court so-ordered the Stipulation for Protective Order and Proposed Order in these actions among defendant Intuitive Surgical, Inc., plaintiff Illinois Union Insurance Company, and plaintiff Navigators Specialty Insurance Company (the "Protective Order");

WHEREAS, Ironshore Specialty Insurance Company ("Ironshore") has been served with a cross-complaint in this action, and intends to answer, plead or otherwise move in response to the third party complaint;

WHEREAS, the other parties to these actions have agreed to provide Ironshore with copies of all discovery exchanged to date in these actions pursuant to a separate stipulation filed concurrently herewith;

WHEREFORE, the parties herein stipulate as follows:

- 1. The time for Ironshore to answer, plead or otherwise move in response to the third

1 party complaint is extended to and including April 10, 2015;

2 2. Ironshore agrees it will comply with the terms of the Protective Order in the same
3 manner as if it had been an original signatory;

4 3. By (a) April 17, 2015, or (b) one week after this Stipulation and Proposed Order (or
5 similar Order affirming application of the Protective Order to Ironshore) is entered, whichever
6 occurs last, the other parties will provide Ironshore with all discovery exchanged to date in these
7 actions.

8 Dated: March 19, 2015

/s/ Charles E. Wheeler _____
Thomas M. Jones
Charles E. Wheeler
Amanda M. Lorenz
COZEN O'CONNOR
Attorneys for Plaintiff
ILLINOIS UNION INSURANCE
COMPANY

13 Dated: March 19, 2015

/s/ John S. Pierce
David J. McMahon
Peter Felsenfeld
HINSHAW & CULBERTSON LLP
Attorneys for Plaintiff
NAVIGATORS SPECIALTY
INSURANCE COMPANY

17 Dated: March 19 2015

/s/ Raoul Kennedy
Allen Ruby
Raoul Kennedy
Thomas Haroldson
Sheryl Leung

SKADDEN, ARPS, SLATE, MEAGHER &
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Attorneys for Defendant and Cross-
Complainant
INTUITIVE SURGICAL, INC.

24 Dated: March 19, 2015

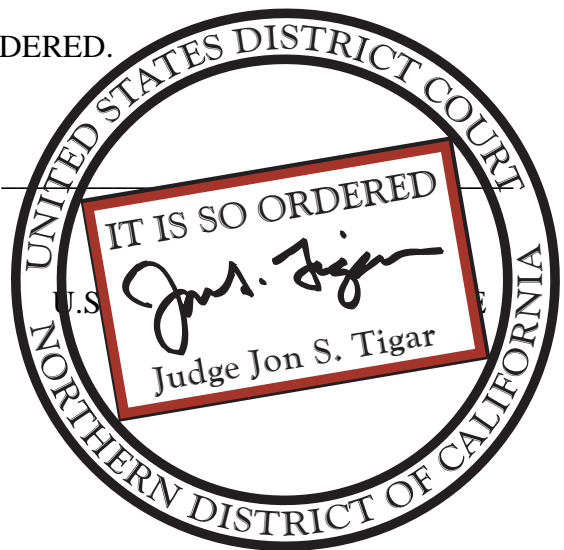
/s/ Ronald P. Schiller
Ronald P. Schiller
Sharon F. McKee

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
Attorneys for Cross-Defendant
IRONSHORE SPECIALTY INSURANCE
COMPANY

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2 Dated: March 20, 2015

3 By: _____



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