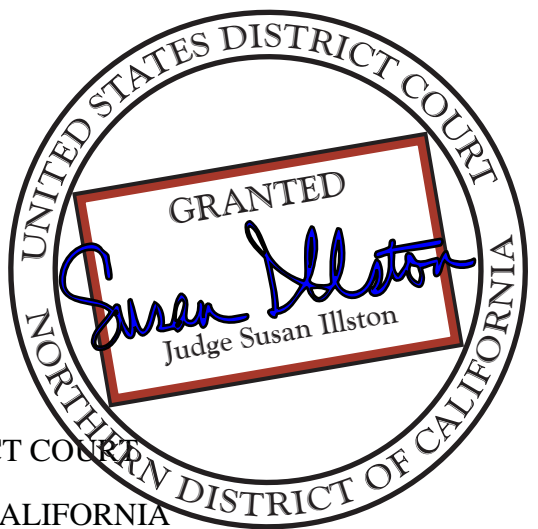


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14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 THE FLINTKOTE COMPANY AND
 THE FLINTKOTE TRUST,
 18
 Plaintiff,
 19
 v.
 20 AVIVA PLC, AVIVA INTERNATIONAL
 21 INSURANCE LIMITED, AND OCEAN
 22 MARINE INSURANCE CO. LTD.,
 23
 Defendants.

Case No. 3:15-CV-01638-SI
**STIPULATION OF CONFIDENTIALITY
 UNDER LOCAL RULE 7-12**

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1 Defendants Aviva plc, Aviva International Insurance Limited (formerly known as
2 Commercial Union Assurance Company Limited) and The Ocean Marine Insurance Co. Limited,
3 (collectively, "Ocean Marine"), by and through their counsel of record, hereby file the following
4 stipulation pursuant to Local Rules 7-11(a) and 7-12 attesting to Ocean Marine's agreement with
5 plaintiffs, The Flintkote Company and the Flintkote Trust (collectively, "Flintkote"), as to the
6 confidential nature of documents attached as exhibits to and referenced in Ocean Marines' Motion
7 for Partial Summary Judgment.

8 **STIPULATION**

9 Flintkote and Ocean Marine, through their undersigned counsel, stipulate as follows:

10 Flintkote and Certain London Companies are presently engaged in a related arbitration
11 proceeding, *The Flintkote Company v. Certain London Companies*, Arbitration No. W-14-01,
12 JAMS No. 141000640.

13 Appendix C, §100.7 of the Wellington Agreement provides that alternative dispute
14 resolution proceedings undertaken pursuant to the Wellington Agreement are to be confidential
15 and the current proceedings are protected by a protective order.

16 The parties agree the following documents from the above-referenced arbitration should
17 remain confidential and should be placed under seal in this litigation:

- 18 • Flintkote's Responses and Objections to Certain London Companies First Set of
19 Interrogatories, *The Flintkote Company v. Certain London Companies*, Arbitration No.
20 W-14-01, JAMS No. 141000640, June 22, 2015;
- 21 • Deposition Transcript of Eric Bower, *The Flintkote Company v. Certain London
22 Companies*, Arbitration No. W-14-01, JAMS No. 141000640, August 13, 2015;
- 23 • "Phase I Rulings," filed in *The Flintkote Company v. Certain London Companies*,
24 Arbitration No. W-14-01, JAMS No. 141000640, January 9, 2016; and
- 25 • "Order on Motion for Reconsideration," filed in *The Flintkote Company v. Certain
26 London Companies*, Arbitration No. W-14-01, JAMS No. 141000640, February 2, 2016.

26 Any references to these documents should be redacted in Court filings. Ocean Marine
27 intends to attach and reference these documents as exhibits to its Motion for Partial Summary
28 Judgment.

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Respectfully submitted,
IRELL & MANELLA LLP

Dated: February 5, 2016

By: /s/ Michael Fehner
Michael Fehner
Attorneys for Plaintiff
The Flintkote Company/The Flintkote Trust

Dated: February 5, 2016

CLYDE & CO US LLP

By: /s/ Andrew G. Wanger
Andrew G. Wanger
Attorneys for Defendants Aviva plc/
Aviva International Insurance Limited/
Ocean Marine Insurance Company Limited

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: February 5, 2016

/s/ Andrew G. Wanger
Attorney for Defendants