1 2 3 4 5 6 7 8 9	Nicholas P. Roxborough, Esq. (SBN 1135 npr@rpnalaw.com Burton E. Falk, Esq. (SBN 100644) bef@rpnalaw.com Charles R. Rondeau (SBN 164136) <u>crr@rpnalaw.com</u> ROXBOROUGH, POMERANCE, NYE & 5820 Canoga Ave., Ste. 250 Woodland Hills, CA91367 Tel: (818) 992-9999 Fax: (818) 992-9999 Fax: (818) 992-9991 Attorneys for Defendant RECOLOGY, INC., f/k/a NORCAL WASTE SYSTEMS, INC.	
11	NORTHERN DISTR	ICT OF CALIFORNIA
12		
13	CONTINENTAL CASUALTY COMPANY, an Illinois corporation,) CASE NO. 3:15-cv-03969-SI
14) Complaint filed on August 31, 2015
15	Plaintiff,) STIPULATION TO CONTINUE) CASE MANAGEMENT
16	VS.) CONFERENCE PURSUANT TO) CIVIL LOCAL RULES 16-2(e)
17 18	RECOLOGY, INC., f/k/a NORCAL WASTE SYSTEMS, INC., a California corporation,) AND 7-12; [PROPOSED] ORDER) THEREON
19	Defendants.) CURRENT
20		 Hearing Date: December 4, 2015 Time: 2:30 p.m. Courtroom: 10
21) NEW
22		Hearing Date: December 18, 2015
23) Time: 2:30 p.m.) Courtroom: 10
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STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER THEREON

1	TO THE COURT, ALL INTERESTED PARTIES AND THEIR COUNSEL	
2	OF RECORD:	
3	WHEREAS, the original Case Management Conference ("CMC") was set by	
4	the Court for Friday, December 4, 2015 at 2:30 p.m.;	
5	WHEREAS, Defendant Recology, Inc., f/k/a Norcal Waste Systems, Inc.'s	
6	("Defendant") lead trial counsel Nick Roxborough recently discovered that he would	
7	be out of town on December 4, 2015 for business-related purposes for a meeting that	
8	could not be rescheduled;	
9	WHEREAS, Plaintiff Continental Casualty Company's ("Plaintiff") lead trial	
10	counsel G. David Godwin is unavailable on December 11, 2015;	
11	WHEREAS, the first date upon which both parties' lead trial counsel will be	
12	available is therefore December 18, 2015;	
13	WHEREAS, the parties are already engaging in an informal exchange of	
14	documents in preparation for a proposed early mediation date, and good cause exists	
15	for the requested continuance of the CMC; and	
16	WHEREAS, Defendant's counsel checked Judge Illston's online calendar and	
17	did not find any conflict or unavailability for the Court on December 18, 2015.	
18	NOW, THEREFORE, IT IS HEREBY STIPULATED that the CMC shall be	
19	continued from December 4, 2015 to December 18, 2015 at 2:30 p.m.	
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21	DATED: October 19, 2015	
22	RESPECTFULLY SUBMITTED,	
23	ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP	
24		
25	By: <u>/s/ Burton E. Falk</u> NICHOLAS P. ROXBOROUGH	
26	BURTON E. FALK CHARLES R. RONDEAU	
27	Attorneys for Defendant RECOLOGY, INC., f/k/a NORCAL WASTE SYSTEMS, INC.	
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1	CARROLL, BURDICK & McDONOUGH
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3	By: <u>/s/ Geoffrey David Godwin</u> GEOFFREY DAVID GODWIN Attorneys for Plaintiff CONTINENTAL CASUALTY COMPANY, an Illinois corporation
4	CONTINENTAL CASUALTY COMPANY, an Illinois corporation
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1	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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3	DATE: 10/20/15 By:
4	THE HONORABLE SUSAN ILLSTON
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