

1 LINDA WENDELL HSU (SBN 162971)
 lhsu@selmanlaw.com
 2 MARK E. INBODY (SBN 180862)
 minbody@selmanlaw.com
 3 REBEKAH SHAPIRO (SBN 262834)
 rshapiro@selmanlaw.com
 4 SELMAN BREITMAN LLP
 33 New Montgomery, Sixth Floor
 5 San Francisco, CA 94105-4537
 Telephone: 415.979.0400
 6 Facsimile: 415.979.2099

7 Attorneys for Plaintiff
 8 NATIONWIDE MUTUAL INSURANCE COMPANY

9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12
 13 NATIONWIDE MUTUAL INSURANCE
 COMPANY,
 14
 Plaintiff,
 15
 v.
 16
 CERTAIN UNDERWRITERS AT LLOYD'S,
 17 LONDON,
 18
 Defendant.

Case No. 3:15-CV-05503-RS
 STIPULATION AND [~~PROPOSED~~] ORDER
 FOR STAY
 Judge: Richard Seeborg
 Complaint Filed: December 1, 2015
 Trial Date: November 13, 2017

19 1. WHEREAS, motions for summary judgment are under submission to the Court
 20 [Docket # 74].

21 2. WHEREAS, the Court, on its own motion, recently continued the next Case
 22 Management Conference to August 24, 2017, which is after the August 3, 2017 deadline for
 23 completing discovery and hearing pre-trial motions [Docket # 50, 59 and 78].

24 3. WHEREAS, the parties wish to avoid the time and expense of discovery and
 25 motions on issues that will be resolved through the motions for summary judgment.

26 ///
 27 ///
 28

Selman Breitman LLP
 ATTORNEYS AT LAW

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

THEREFORE the parties agree and request that the Court stay the case pending a ruling on the motions for summary judgment and vacate the August 3, 2017 discovery and motion deadline.

DATED: July 10, 2017

SELMAN BREITMAN LLP

By: /s Linda Wendell Hsu
LINDA WENDELL HSU
MARK E. INBODY
REBEKAH SHAPIRO
Attorneys for Plaintiff
NATIONWIDE MUTUAL INSURANCE
COMPANY

DATED: July 10, 2017

COCHRAN, DAVIS & ASSOCIATES, P.C.

By: /s Lisa Kralick Hansen
JOAN E. COCHRAN
LISA KRALIK HANSEN
Attorneys for Defendant
CERTAIN UNDERWRITERS AT LLOYD'S,
LONDON

IT IS SO ORDERED.

Dated: 7/11/17



Honorable RICHARD SEEBORG
Judge of the United States District Court