

1 **THE AGUILERA LAW GROUP, APLC**
 2 A. Eric Aguilera, Esq. (SBN 192390)
 3 Kimberly R. Arnal, Esq. (SBN 200448)
 4 Jason Y. Chao, Esq. (SBN 250735)
 5 Rebecca E. Hunter, Esq. (SBN 271420)
 6 650 Town Center Drive, Suite 100
 7 Costa Mesa, CA 92626
 8 T: 714-384-6600 / F: 714-384-6601
 9 eaguilera@aguileragroup.com
 karnal@aguileragroup.com
 jchao @aguileragroup.com
 rhunter@aguileragroup.com

10 Attorneys for Plaintiffs, TRAVELERS PROPERTY CASUALTY COMPANY OF
 11 AMERICA

12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA –SAN FRANCISCO DIVISION**

15 TRAVELERS PROPERTY CASUALTY)	Case No. 3:16-cv-00815-HSG
16 COMPANY OF AMERICA, a)	
17 Connecticut corporation,)	REQUEST TO EXTEND TIME OF
18 Plaintiffs,)	THE COURT’S CONDITIONAL
19 v.)	DISMISSAL AND ORDER
20)	
21 RANGER PIPELINE, INC., a California)	
22 corporation; and DOES 1 through 10)	
23 inclusive,)	
24 Defendants.)	
25)	
26)	

27
 28

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF**
2 **RECORD:**

3 Plaintiff TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA
4 (“Travelers”) hereby submits this updated settlement report and request for an
5 extension of the Court’s March 22, 2016, Conditional Order of Dismissal. [ECF No.
6 14.]

7 The Court had previously granted an extension of the March 22, 2016,
8 Conditional Order of Dismissal on June 1, 2016. [ECF No. 17.]

9 Additionally, the Court had granted a second request for extension of the
10 March 22, 2016, Conditional Order of Dismissal on August 30, 2016. [ECF No. 19.]

11 The parties have finalized the settlement agreement in this case. However, the
12 settlement is conditioned on defendant RANGER PIPELINE, INC. (“Ranger
13 Pipeline”) obtaining a good faith settlement order in the underlying construction
14 defect case entitled The Regents of the University of California v. RMF Engineering,
15 Inc., et al., San Francisco Superior Court Case No. CGC-12-518341 (the “Underlying
16 Action”). Additionally, payment is required pursuant to the settlement agreement.

17 On November 28, 2016, the parties obtained the required good faith settlement
18 order in the Underlying Action. However, the required payment pursuant to the
19 settlement agreement has not been fulfilled.

20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1 Due to the conditional nature of the settlement agreement and the required
2 payment that needs to be made pursuant to the settlement, Travelers requests that this
3 Court continue to retain jurisdiction of this case for another sixty (60) days or until
4 Travelers files a dismissal with prejudice prior to the sixty (60) day extension of the
5 conditional dismissal.

6
7 Dated: November 28, 2016 **THE AGUILERA LAW GROUP, APLC**

8 */s/ Rebecca E. Hunter*


9 _____
10 A. Eric Aguilera, Esq.
11 Kimberly R. Arnal, Esq.
12 Jason Y. Chao, Esq.
13 Rebecca E. Hunter, Esq.
14 Attorneys for Plaintiff TRAVELERS PROPERTY
15 CASUALTY COMPANY OF AMERICA
16
17
18
19
20
21
22
23
24
25
26
27
28

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

ORDER

IT IS HEREBY ORDERED that the request is **DENIED**. The Court sets a telephonic conference for December 6, 2016, at 3:00 p.m. Counsel shall contact CourtCall at (866) 582-6878 to make arrangements for the telephonic appearance.

Date: November 29, 2016


Hon. Haywood S. Gilliam, Jr.
U.S. District Court Judge