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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 UNITED STATES FIDELITY AND
 13 GUARANTY COMPANY, et al.,

14 Plaintiffs,

15 v.

16 THE SCOTT COMPANIES, INC., et al.,

17 Defendants.

Case No. CV-03-5376- SBA
 CV-06-5590-EMC

**STIPULATION TO CONTINUE THE
 MARCH 23, 2011 CONTINUED HEARING
 ON PLAINTIFFS' MOTION FOR ORDER
 TO SELL SECURITIES TO PARTIALLY
 SATISFY PLAINTIFFS' JUDGMENT
 AGAINST JOSEPH GUGLIELMO;
 [PROPOSED] ORDER THEREON**

Date: March 23, 2011
 Time: 10:30 a.m.
 Judge: Magistrate Edward M. Chen
 Courtroom: C-15th Floor

20 Plaintiffs United States Fidelity and Guaranty Company, Fidelity and Guaranty Insurance
 21 Company, St. Paul Fire and Marine Insurance Company and St. Paul Medical Liability Insurance
 22 Company (collectively, "St. Paul") and Judgment Debtor Joseph Guglielmo ("Guglielmo"),
 23 through their respective counsel, hereby stipulate and agree as follows:

24 WHEREAS:

25 A. St. Paul's Motion for Order to Sell Securities to Partially Satisfy Plaintiffs'
 26 Judgment Against Joseph Guglielmo ("Motion") was heard by this Court on January 4, 2011 at or
 27 about 10:30 a.m.
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1 B. In its January 11, 2011 Order on the Motion ("Schwab Account Order"), the Court
2 ordered that information regarding a certain account maintained by Guglielmo at Charles Schwab
3 & Co., Inc. be exchanged with St. Paul. Further, the Court ordered that the parties submit further
4 briefing regarding Guglielmo's need for the funds on February 16, 2011, and set a further hearing
5 regarding Plaintiffs' Motion on February 23, 2011.

6 C. On January 14, 2011, St. Paul sent Guglielmo a letter demanding that Guglielmo
7 provide certain documents and information pertaining to his financial condition by January 28,
8 2011 in accordance with the Schwab Account Order ("St. Paul Letter Demand").

9 D. Thereafter, St. Paul and Guglielmo began discussing the possible resolution of
10 their dispute. To allow for their discussion to progress, St. Paul agreed to continue the briefing
11 regarding Guglielmo's need for the funds to March 9, 2011 and the hearing on St. Paul's Motion
12 to March 23, 2011. The Court agreed to the continued dates (Case No. CV-06-5590-EMC,
13 Docket No. 97 and Case No. CV-03-5376-SBA, Docket No. 410).

14 E. St. Paul and Guglielmo are presently actively engaged in discussions which may,
15 if successful, ultimately resolve the entire dispute between them, and thereby obviate the need for
16 the information sought in the St. Paul Letter Demand, the additional submissions to this Court
17 and the continued hearing on the Motion.

18 **WHEREFORE,**

19 To allow St. Paul and Guglielmo to complete their discussions without potentially
20 unnecessarily incurring additional expenses and to avoid the potentially unnecessarily
21 expenditure of the resources of this Court, St. Paul and Guglielmo agree to continue:

- 22 1. The hearing on St. Paul's Motion from March 23, 2011 by thirty-five (35)
23 days (to April 27, 2011), as the Court's calendar may permit;
- 24 2. St. Paul's and Guglielmo's submission of additional briefing in accordance
25 with the Court's Schwab Account Order from March 9, 2011 to two (2) weeks before the
26 continued hearing date on the Motion (to April 13, 2011); and
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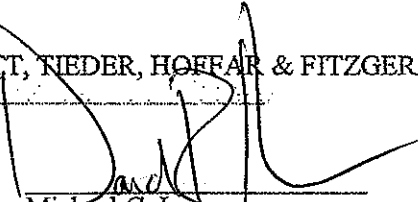
3. The deadline for Guglielmo to provide to St. Paul the documentation and information demanded by St. Paul in its St. Paul Letter Demand to thirty (30) days before the hearing (approximately March 28, 2011).

IT IS SO STIPULATED.

Dated: March 8, 2011

WATT, NIEDER, HOFFAR & FITZGERALD, L.L.P.

By:

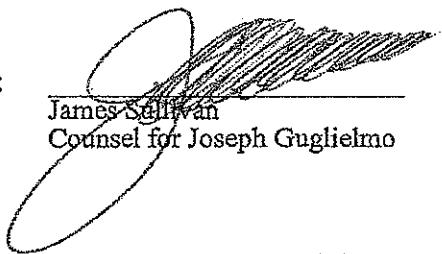


Michael G. Long
David R. Johnson
Counsel for Plaintiffs

Dated: March 8, 2011

LAW OFFICES OF JAMES M. SULLIVAN, INC.

By:



James Sullivan
Counsel for Joseph Guglielmo

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ORDER

After considering the Stipulation of the parties, and good cause existing therefore, IT IS
HEREBY ORDERED THAT:

March 23, 2011

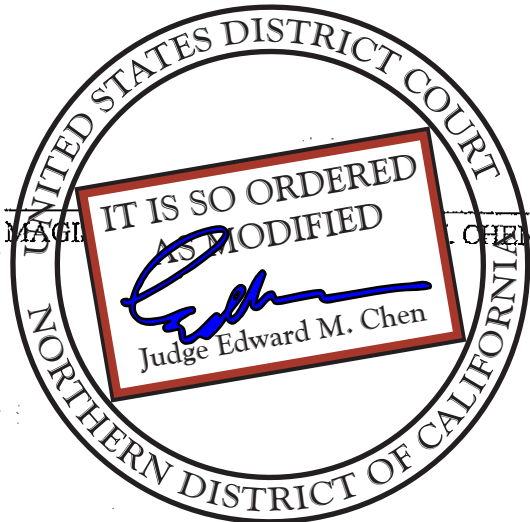
1. The hearing on St. Paul's Motion is continued from ~~April 27, 2011~~ at 10:30
a.m. to May 4, 2011 at 3:00 ~~a.m.~~/p.m.;

2. The deadline for St. Paul and Guglielmo to submit additional briefing in
accordance with the Court's January 11, 2011 Schwab Account Order is continued from
March 9, 2011 to April 20, 2011.

3. The deadline for Guglielmo to provide to St. Paul the documentation and
information demanded by St. Paul in its St. Paul Letter Demand is
April 4, 2011.

IT IS SO ORDERED

Dated: March 10, 2011



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