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 SEAGATE TECHNOLOGY LLC,
 8 SEAGATE TECHNOLOGY
 INTERNATIONAL, SEAGATE
 9 SINGAPORE INTERNATIONAL
 HEADQUARTERS PTE LTD

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 OAKLAND DIVISION

15 SEAGATE TECHNOLOGY LLC, a
 Delaware corporation,
 16 SEAGATE TECHNOLOGY
 INTERNATIONAL, a Cayman Islands
 17 Company; SEAGATE SINGAPORE
 INTERNATIONAL HEADQUARTERS
 18 PTE LTD, a Singapore corporation,

19 Plaintiffs,

20 vs.

21 NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA, a
 22 Pennsylvania corporation; INSURANCE
 COMPANY OF THE STATE OF
 23 PENNSYLVANIA, a Pennsylvania
 corporation,

24 Defendants.
 25

Case No. 4:09-cv-04120-CW

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME PURSUANT TO CIVIL
 LOCAL RULE 6-2; ORDER**

Judge: Hon. Claudia Wilken
 Courtroom: 2

Complaint Filed: September 4, 2009

26 Pursuant to Civil Local Rule 6-2, the parties, through their undersigned counsel, submit
 27 the following stipulation and request an order changing time:

28 WHEREAS, the Court filed a Minute Order and Case Management Order on December

1 18, 2009 (the “December 18 Order”), which set the schedule for the above-captioned case as
2 follows:

3 1/12/10: Completion of briefing on Plaintiffs’ summary judgment motion as to Defendant
4 Insurance Company of the State of Pennsylvania’s (“ISOP”) duty to defend and Defendants’
5 motion to compel arbitration

6 03/31/10: Completion of ADR session

7 06/15/10: Completion of fact discovery

8 06/18/10: Disclosure of identities and reports of expert witnesses

9 07/09/10: Disclosure of expert rebuttal reports

10 07/30/10: Completion of expert discovery

11 08/12/10: Defendants to file case-dispositive motion

12 08/26/10: Plaintiff to file opposition to case-dispositive motion and any cross-motion

13 09/02/10: Defendants to file reply/opposition to cross-motion

14 09/09/10: Plaintiff to file reply in support of cross-motion

15 09/23/10: Hearing of all case-dispositive motions and further case management
16 conference

17 03/29/11: Final pre-trial conference

18 04/11/11: 10-day jury trial to begin

19 WHEREAS, the parties completed briefing on Plaintiffs’ summary judgment motion and
20 Defendants’ motion to compel arbitration and the ADR session within the schedule set forth in
21 the December 18 Order;

22 WHEREAS, on May 7, 2010, the parties requested that the Court continue the dates for
23 the completion of fact and expert discovery and the hearing of dispositive motions, but not extend
24 the current final pre-trial conference and the trial dates;

25 WHEREAS, on May 10, 2010, the Court granted the parties’ request and approved the
26 following schedule:

27 08/27/10: Completion of fact discovery

28 08/30/10: Disclosure of identities and reports of expert witnesses

1 09/20/10: Disclosure of expert rebuttal reports
2 10/08/10: Completion of expert discovery
3 10/21/10: Defendants to file case-dispositive motion
4 11/04/10: Plaintiff to file opposition to case-dispositive motion and any cross-motion
5 11/11/10: Defendants to file reply/opposition to cross-motion
6 11/18/10: Plaintiff to file reply in support of cross-motion
7 12/09/10 at 2:00 p.m.: Hearing of all case-dispositive motions and further case
8 management conference
9 03/29/11 at 2:00 p.m.: Final pre-trial conference (UNCHANGED)
10 04/11/11 at 8:30 a.m.: 10-day jury trial to begin (UNCHANGED)

11 WHEREAS, on July 29, 2010, the parties requested that the Court continue the dates for
12 the completion of expert discovery and the hearing of dispositive motions, but not extend the
13 current final pre-trial conference and the trial dates;

14 WHEREAS, on August 2, 2010, the Court granted the parties' request and approved the
15 following schedule:

16 09/27/10: Disclosure of identities and reports of expert witnesses
17 10/18/10: Disclosure of expert rebuttal reports
18 11/05/10: Completion of expert discovery
19 11/18/10: Defendants to file case-dispositive motion
20 12/09/10: Plaintiff to file opposition to case-dispositive motion and any cross-motion
21 12/16/10: Defendants to file reply/opposition to cross-motion
22 12/23/10: Plaintiff to file reply in support of cross-motion
23 01/13/11 at 2:00 p.m.: Hearing of all case-dispositive motions and further case
24 management conference
25 03/29/11 at 2:00 p.m.: Final pre-trial conference (UNCHANGED)
26 04/11/11 at 8:30 a.m.: 10-day jury trial to begin (UNCHANGED)

27 WHEREAS, on August 23, 2010, the parties requested that the Court order that Plaintiffs
28 may serve a former employee of AIG WorldSource who had not yet been located, Mr. Alijah

1 Rabelde, with a deposition subpoena and/or take Mr. Rabelde's deposition after the fact
2 discovery cut-off of August 27, 2010, so long as the deposition occurred on or before September
3 17, 2010;

4 WHEREAS, on August 24, 2010, the Court granted the parties' request to extend the time
5 to take Mr. Rabelde's deposition; no other deadlines were affected at that time;

6 WHEREAS, Plaintiffs have continued to diligently seek to secure the deposition of Mr.
7 Rabelde but have not yet been able to serve him with a deposition subpoena;

8 WHEREAS, as a courtesy to Seagate, Defendants have agreed to allow Plaintiffs an
9 additional two weeks to depose Mr. Rabelde;

10 WHEREAS, the parties agree to continue by two weeks the cut-off for taking Mr.
11 Rabelde's deposition, expert disclosures, and expert discovery;

12 THEREFORE, IT IS HEREBY STIPULATED THAT:

13 1. Plaintiffs may serve Mr. Rabelde with a deposition subpoena and/or take Mr.
14 Rabelde's deposition so long as the deposition occurs on or before October 1, 2010;

15 2. The schedule set forth in the August 2, 2010 order shall be modified as follows:

16 10/12/10: Disclosure of identities and reports of expert witnesses

17 11/1/10: Disclosure of expert rebuttal reports

18 11/18/10: Completion of expert discovery

19 3. No other deadlines currently set in this case shall be affected by this Stipulation
20 and [Proposed] Order absent further agreement and application to the Court.

21 Dated: September 8, 2010

FARELLA BRAUN + MARTEL LLP

22 I represent that concurrence in the filing of this
23 document has been obtained from the other
24 signatory, which shall serve in lieu of his
signature on this document.

By: /s/ Tyler C. Gerking
Tyler C. Gerking

25 Attorneys for Plaintiffs
26 SEAGATE TECHNOLOGY LLC, SEAGATE
27 TECHNOLOGY INTERNATIONAL,
SEAGATE SINGAPORE INTERNATIONAL
28 HEADQUARTERS PTE LTD

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Dated: September 8, 2010

LEWIS BRISBOIS BISGAARD & SMITH,
LLP

By: /s/ Stephen Kovarik
Stephen Kovarik

Attorneys for Defendants
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA and
INSURANCE COMPANY OF THE STATE
OF PENNSYLVANIA

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 9/9/2010



JUDGE CLAUDIA WILKEN
United States District Judge

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PROOF OF SERVICE

I, the undersigned, declare that I am a resident of the State of California, employed in the County of San Francisco, over the age of eighteen years and not a party to the within action. My business address is: Farella Braun + Martel LLP, 235 Montgomery Street, 17th Floor, San Francisco, California 94104.

On this date I served the within document(s):

STIPULATED REQUEST FOR ORDER CHANGING TIME PURSUANT TO CIVIL LOCAL RULE 6-2; [PROPOSED] ORDER

X **BY ELECTRONIC FILING:** the within document(s), the automatically generated notification for which constitutes service pursuant to General Order 45, Section IX(A) and (B).

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Attorneys for Defendants National Union Fire Insurance Company Of Pittsburgh, PA and Insurance Company Of The State Of Pennsylvania

X **MAIL:** by placing a true copy thereof, addressed as set forth below and enclosed in a sealed envelope with postage thereon fully prepaid and deposited for collection and mailing with the U.S. Postal Service. I am readily familiar with the ordinary business practice of this office for processing mail.

X **ELECTRONIC TRANSMISSION:** a true and correct copy transmitted to each of the parties at the electronic notification address last given by said party on any document which he or she has filed in this action and served upon this office.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed in San Francisco, California on **September 9, 2010**.

/s/ Lawrence L. Coles
Lawrence L. Coles