1	Counsel listed on next page	TES DISTRICO
2	1 0	STATES DE TOCT
3		IT IS SO ORDERED
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5		Z Judge James Ware
6		Judger J
7		TER DISTRICT OF 2/17/2011
8	UNITED STAT	ES DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN JOSE DIVISION	
11		
12	NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA;	CASE NO: C 04-01593 JW
13	AMERICAN INTERNATIONAL UNDERWRITERS INSURANCE	STIPULATION FOR APPROVAL OF SUPERSEDEAS BOND AND STAY OF
14	COMPANY AND AMERICAN INTERNATIONAL SPECIALTY LINES	EXECUTION OF JUDGMENT PENDING APPEAL
15	INSURANCE COMPANY,	The Honorable James Ware
16	Plaintiffs,	
17	v.	
18	SEAGATE TECHNOLOGY, INC.,	
19	Defendant.	
20	SEAGATE TECHNOLOGY INC.,	
21	Counterclaimant,	
22	v.	
23	NATIONAL UNION FIRE INSURANCE	
24	COMPANY OF PITTSBURGH, PA; AMERICAN INTERNATIONAL	
25	UNDERWRITERS INSURANCE COMPANY AND AMERICAN	
26	INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY,	
27	Counterclaim Defendants.	
28	642586 STIPULATION TO APPROVE	
	SUPERSEDEAS BOND	CASE NO. C 04-01593 JW

11       INTERNATIONAL UNDERWRITERS INSURANCE COMPANY         12       ARCHIE S. ROBINSON (SBN 34789)         13       ROBINSON & WOOD, INC.         14       San Jose, CA 95113         15       Telephone: 408-298-0477         16       Attorneys for Plaintiff and Counterclaim Defendant         17       Attorneys for Plaintiff and Counterclaim Defendant         17       AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY         18       ROBERT E. FREITAS (STATE BAR NO. 80948)         19       DANIEL J. WEINBERG (STATE BAR NO. 227159)         00       ORRICK, HERRINGTON & SUTCLIFFE LLP         1000 Marsh Road       Menio Park, CA 94025         11       Telephone: 650-614-7401         23       Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC         24       5         25		
2       MICHAEL P. PULLIAM (SBN 215435) DRINKER BIDDLE & REATH LLP         3       50 Fremont Street, 20th Floor         San Francisco, California 94105-2235         4       Telephone: 415-591-7500         5       Appearing Pro Hac Vice         6       WILLIAM T. CORBETT, JR.         MARK D. SHERIDAN       DRINKER BIDDLE & REATH LLP         500 Campus Drive       973-360-1100         9       Facsimile: 973-360-100         9       Facsimile: 973-360-9831         10       Automeys for Plaintiffs and Counterclaim Defendants         NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA         11       NTTERNATIONAL UNDERWRITERS INSURANCE COMPANY         12       ARCHIE S. ROBINSON (SBN 34789)         13       JOSHUA J. BORGER (SBN 231951)         14       San Jose, CA 95113         15       Telephone: 408-298-120         16       Attomeys for Plaintiff and Counterclaim Defendant         17       AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY         18       ROBERT E. FREITAS (STATE BAR NO. 202159)         19       ROBERT E. FREITAS (STATE BAR NO. 20948)         1000 Marsh Road       Menlo Park, CA 94025	1	
3       \$0 Fremont Street, 20th Floor         3       \$50 Fremotics, California 94105-2235         4       Telephone: 415-591-7500         7       Pacsimile: 415-591-7510         6       WILLIAM T. CORBETT, JR.         MARK D. SHERIDAN       Papeoring Pro Hac Vice         6       WILLIAM T. CORBETT, JR.         MARK D. SHERIDAN       Papeoring Pro Hac Vice         7       PRINKER BIDDLE & REATH LLP         \$500 Campus Drive       Florham Park, New Jersey 07932-1047         7       Telephone: 973-360-9831         10       Attorneys for Plaintiffs and Counterclaim Defendants         NATTONAL UNDON FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA         11       INTERNATIONAL UNDERWRITERS INSURANCE COMPANY         12       ARCHIE S. ROBINSON (SBN 34789)         13       JOSHUA J. BORGER (SBN 231951)         ROBINSON & WOOD, INC.       227         231       Telephone: 408-298-7120         Facsimile:       408-298-7120	2	MICHAEL P. PULLIAM (SBN 215435)
4       Telephone:       415-591-7510         5       Appearing Pro Hac Vice         6       WILLIAM T. CORBETT, JR.         MARK D. SHERIDAN       NARK D. SHERIDAN         7       DRINKER BIDDLE & REATH ILLP         500 Campus Drive       Florinam Park, New Jersey 07932-1047         7       Telephone:       973-360-100         9       Facsimile:       973-360-9831         10       Attorneys for Plaintiffs and Counterclaim Defendants         NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA         11       INTERNATIONAL UNDERWRITERS INSURANCE COMPANY         12       ARCHIE S. ROBINSON (SBN 34789)         13       ROBINSON & WOOD, INC.         14       227 North First Street         15       Telephone:         16       Attorneys for Plaintiff and Counterclaim Defendant         17       Attorneys for Plaintiff and Counterclaim Defendant         18       Telephone:         19       ROBERT E. FREITAS (STATE BAR NO. 80948)         19       DABERT E. FREITAS (STATE BAR NO. 227159)         100       ORRICK, HERRINGTON & SUTCLIFFE LLP         1000 Marsh Road       Menilo Park, CA 94025         11       Telephone:       650-614-7400         12	3	50 Fremont Street, 20th Floor
5       Appearing Pro Hac Vice         6       WILLIAM T. CORBETT, JR.         MARK D. SHERIDAN       DRINKER BIDDLE & REATH LLP         500 Campus Drive       973-360-100         7       Flortham Park, New Jersey 07932-1047         7       Telephone: 973-360-100         9       Facsimile: 973-360-9831         10       Attorneys for Plaintiffs and Counterclaim Defendants NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA         11       INTERNATIONAL UNDERWRITERS INSURANCE COMPANY         12       ARCHIE S. ROBINSON (SBN 34789)         13       JOSHUA J. BORGER (SBN 231951)         14       San Jose, CA 95113         15       Telephone: 408-298-7120         Facsimile: 408-298-0477         16       Attorneys for Plaintiff and Counterclaim Defendant         17       AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY         18       ROBERT E. FREITAS (STATE BAR NO. 80948)         19       DORICK, HERRINGTON & SUTCLIFFE LLP         1000 Marsh Road       Menio Park, CA 94025         11       Telephone: 650-614-7400         12       Facsimile: 650-614-7401         13       Attorneys for Defendant and Counterclaimant         SEAGATE TECHNOLOGY LLC <td< td=""><td>4</td><td>Telephone: 415-591-7500</td></td<>	4	Telephone: 415-591-7500
<ul> <li>WILLIAM T. CORBETT, JR. MARK D. SHERIDAN</li> <li>DRINKER BIDDLE &amp; REATH LLP 500 Campus Drive</li> <li>Florham Park, New Jersey 07932-1047 Telephone: 973-360-9831</li> <li>Attorneys for Plaintiffs and Counterclaim Defendants NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA</li> <li>INTERNATIONAL UNDERWRITERS INSURANCE COMPANY</li> <li>ARCHIE S. ROBINSON (SBN 34789) JOSHUA J. BORGER (SBN 231951) ROBINSON &amp; WOOD, INC.</li> <li>227 North First Street San Jose, CA 95113 Telephone: 408-298-0477</li> <li>Attorneys for Plaintiff and Counterclaim Defendant AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY</li> <li>ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRET E. FREITAS (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 1000 Marsh Road</li> <li>Menio Park, CA 94025 Telephone: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>408</li> <li>POBERT E. TECHNOLOGY LLC</li> <li>410</li> <li>41</li></ul>	5	
7       DRINKER BIDDLE & REATH LLP 500 Campus Drive Florham Park, New Jersey 07932-1047 Telephone: 973-360-9831         10       Attorneys for Plaintiffs and Counterclaim Defendants NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA INTERNATIONAL UNDERWRITERS INSURANCE COMPANY         11       INTERNATIONAL UNDERWRITERS INSURANCE COMPANY         12       ARCHIE S. ROBINSON (SBN 34789) JOSHUA J. BORGER (SBN 231951) ROBINSON & WOOD, INC.         13       ROBENSON & WOOD, INC.         14       227 North First Street San Jose, CA 95113         15       Felephone: 408-298-0477         16       Attorneys for Plaintiff and Counterclaim Defendant AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY         18       ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159) OORICK, HERINGTON & SUTCLIFFE LLP 1000 Marsh Road Menio Park, CA 94025 Telephone: 650-614-7400         13       Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC         24	6	WILLIAM T. CORBETT, JR.
<ul> <li>Florham Park, New Jersey 07932-1047 Telephone: 973-360-9831</li> <li>Attorneys for Plaintiffs and Counterclaim Defendants NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA INTERNATIONAL UNDERWRITERS INSURANCE COMPANY</li> <li>ARCHIE S. ROBINSON (SBN 34789) JOSHUA J. BORGER (SBN 231951) ROBINSON &amp; WOOD, INC. 227 North First Street San Jose, CA 95113 Telephone: 408-298-0120 Facsimile: 408-298-0477</li> <li>Attorneys for Plaintiff and Counterclaim Defendant AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY</li> <li>ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 1000 Marsh Road</li> <li>Menlo Park, CA 94025 Telephone: 650-614-7400</li> <li>Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>4</li> </ul>	7	DRINKER BIDDLE & REATH LLP
<ul> <li>Facsimile: 973-360-9831</li> <li>Attorneys for Plaintiffs and Counterclaim Defendants NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA INTERNATIONAL UNDERWRITERS INSURANCE COMPANY</li> <li>ARCHIE S. ROBINSON (SBN 34789) JOSHUA J. BORGER (SBN 231951) ROBINSON &amp; WOOD, INC.</li> <li>227 North First Street San Jose, CA 95113 Telephone: 408-298-7120 Facsimile: 408-298-0477</li> <li>Attorneys for Plaintiff and Counterclaim Defendant AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY</li> <li>ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 1000 Marsh Road Menlo Park, CA 94025 Telephone: 650-614-7400 Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>642586 MOTION TO APPROVE</li> </ul>	8	Florham Park, New Jersey 07932-1047
<ul> <li>NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICA INTERNATIONAL UNDERWRITERS INSURANCE COMPANY</li> <li>ARCHIE S. ROBINSON (SBN 34789) JOSHUA J. BORGER (SBN 231951) ROBINSON &amp; WOOD, INC. 227 North First Street San Jose, CA 95113</li> <li>Telephone: 408-298-7120 Facsimile: 408-298-0477</li> <li>Attorneys for Plaintiff and Counterclaim Defendant Attorneys for Plaintiff and Counterclaim Defendant Attorneys for Plaintiff and Counterclaim Defendant ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 1000 Marsh Road Menlo Park, CA 94025 Telephone: 650-614-7400 Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>642586 MOTION TO APPROVE</li> </ul>	9	Facsimile: 973-360-9831
12       ARCHIE S. ROBINSON (SBN 34789)         13       JOSHUA J. BORGER (SBN 231951)         ROBINSON & WOOD, INC.       227         14       227         15       Facsimile: 408-298-7120         16       Attorneys for Plaintiff and Counterclaim Defendant         17       AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY         18       Image: ROBERT E. FREITAS (STATE BAR NO. 80948)         19       ROBERT E. FREITAS (STATE BAR NO. 227159)         10       OOM Marsh Road         11       Menio Park, CA 94025         12       Facsimile: 650-614-7400         13       Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC         24       Image: Robert E. FREITAS (STATE BAR NO. 227159)         10       OMO Marsh Road         11       Menio Park, CA 94025         12       Facsimile: 650-614-7401         23       Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC         24       Image: Robert E. FREITAS (STATE BAR NO. 2000 Marsh Road         25       Image: Robert E.	10	Attorneys for Plaintiffs and Counterclaim Defendants NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and AMERICAN
ARCHIE S. ROBINSON (SBN 34789) JOSHUA J. BORGER (SBN 231951) ROBINSON & WOOD, INC.         14       S27 North First Street San Jose, CA 95113         15       Telephone: 408-298-7120 Facsimile: 408-298-0477         16       Attorneys for Plaintiff and Counterclaim Defendant AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY         17       ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159)         20       ORRICK, HERRINGTON & SUTCLIFFE LLP 1000 Marsh Road         21       Telephone: 650-614-7400 Facsimile: 650-614-7401         23       Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC         24	11	INTERNATIONAL UNDERWRITERS INSURANCE COMPANY
<ul> <li>ROBINSON &amp; WOOD, INC.</li> <li>227 North First Street</li> <li>San Jose, CA 95113</li> <li>Telephone: 408-298-7120</li> <li>Facsimile: 408-298-0477</li> <li>Attorneys for Plaintiff and Counterclaim Defendant</li> <li>AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY</li> <li>ROBERT E. FREITAS (STATE BAR NO. 80948)</li> <li>DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP</li> <li>1000 Marsh Road</li> <li>Menlo Park, CA 94025</li> <li>Telephone: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant</li> <li>SEAGATE TECHNOLOGY LLC</li> <li>642586 MOTION TO APPROVE</li> </ul>	12	
<ul> <li>San Jose, CA 95113 Telephone: 408-298-7120 Facsimile: 408-298-0477</li> <li>Attorneys for Plaintiff and Counterclaim Defendant AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY</li> <li>ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 1000 Marsh Road Menlo Park, CA 94025 Telephone: 650-614-7400 Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>ef2586 MOTION TO APPROVE</li> </ul>	13	ROBINSON & WOOD, INC.
<ul> <li>Facsimile: 408-298-0477</li> <li>Attorneys for Plaintiff and Counterclaim Defendant</li> <li>AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently known as CHARTIS SPECIALTY INSURANCE COMPANY</li> <li>ROBERT E. FREITAS (STATE BAR NO. 80948)</li> <li>DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP</li> <li>1000 Marsh Road</li> <li>Menlo Park, CA 94025</li> <li>Telephone: 650-614-7400</li> <li>Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant</li> <li>SEAGATE TECHNOLOGY LLC</li> <li>642586 MOTION TO APPROVE</li> </ul>	14	San Jose, CA 95113
Attorneys for Plantiff and Counterclaim Defendant         AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, currently         known as CHARTIS SPECIALTY INSURANCE COMPANY         18         19       ROBERT E. FREITAS (STATE BAR NO. 80948)         DANIEL J. WEINBERG (STATE BAR NO. 227159)         20       ORRICK, HERRINGTON & SUTCLIFFE LLP         1000 Marsh Road         21       Menlo Park, CA 94025         7       Telephone:         650-614-7400         23       Attorneys for Defendant and Counterclaimant         SEAGATE TECHNOLOGY LLC         24         25         26         27         28         642586 MOTION TO APPROVE	15	
<ul> <li>known as CHARTIS SPECIALTY INSURANCE COMPANY</li> <li>ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 1000 Marsh Road</li> <li>Menlo Park, CA 94025 Telephone: 650-614-7400</li> <li>Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>4</li> <li>642586 MOTION TO APPROVE</li> </ul>	16	Attorneys for Plaintiff and Counterclaim Defendant
<ul> <li>ROBERT E. FREITAS (STATE BAR NO. 80948) DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 1000 Marsh Road</li> <li>Menlo Park, CA 94025 Telephone: 650-614-7400 Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>4</li> <li>642586 MOTION TO APPROVE</li> </ul>	17	
<ul> <li>DANIEL J. WEINBERG (STATE BAR NO. 227159)</li> <li>ORRICK, HERRINGTON &amp; SUTCLIFFE LLP 1000 Marsh Road</li> <li>Menlo Park, CA 94025 Telephone: 650-614-7400</li> <li>Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>4</li> <li>642586 MOTION TO APPROVE</li> </ul>	18	
<ul> <li>1000 Marsh Road</li> <li>Menlo Park, CA 94025 Telephone: 650-614-7400</li> <li>Facsimile: 650-614-7401</li> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>4</li> <li>5</li> <li>6</li> <li>7</li> <li>6</li> <li>6</li> <li>6</li> <li>7</li> <li>6</li> <li>6</li> <li>6</li> <li>7</li> <li>6</li> <li>6</li> <li>7</li> <li>6</li> <li>6</li> <li>7</li> <li>7</li> <li>8</li> <li>6</li> <li>7</li> <li>7</li> <li>8</li> <li>7</li> <li>7</li> <li>8</li> <li>7</li> <li>7</li> <li>7</li> <li>8</li> <li>7</li> <li>7</li> <li>7</li> <li>8</li> <li>7</li> <li>7</li> <li>7</li> <li>8</li> <li>7</li> <li>9</li> <li>9</li></ul>	19	DANIEL J. WEINBERG (STATE BAR NO. 227159)
21       Telephone: 650-614-7400         22       Facsimile: 650-614-7401         23       Attorneys for Defendant and Counterclaimant         24       SEAGATE TECHNOLOGY LLC         24       25         26       27         28       642586 MOTION TO APPROVE	20	1000 Marsh Road
<ul> <li>Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC</li> <li>4</li> <li>25</li> <li>26</li> <li>27</li> <li>28</li> <li>642586 MOTION TO APPROVE</li> </ul>	21	Telephone: 650-614-7400
<ul> <li>SEAGATE TECHNOLOGY LLC</li> <li>SEAGATE TECHNOLOGY LL</li></ul>	22	Facsimile: 650-614-7401
25 26 27 28 642586 MOTION TO APPROVE	23	Attorneys for Defendant and Counterclaimant SEAGATE TECHNOLOGY LLC
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1	<b>STIPULATION</b>		
2	WHEREAS, plaintiffs National Union Fire Insurance Company of Pittsburgh, Pa.		
3	("National Union"), American International Underwriters Insurance Company ("AIU"), and		
4	American International Specialty Lines Insurance Company, currently known as Chartis Specialty		
5 6	Insurance Company ("Chartis Specialty") (collectively, "Plaintiffs") filed Declaratory Judgment		
0 7	claims against defendant Seagate Technology LLC ("Seagate") seeking a declaration that they		
8	owed no duty to defend or indemnify Seagate in connection with the underlying lawsuit captioned		
9	as Convolve, Inc., et al. v. Seagate Technology LLC, et al, Case No. 00 Civ. 5141 (S.D.N.Y.) (the		
10	"Convolve Action") (Docket Item No. 1); and		
11	WHEREAS, on September 2, 2010, the Court entered a Judgment that, among other things,		
12	entered a money judgment in favor of Seagate in the amount of \$3,128,026.46 against Chartis		
13 14	Specialty in connection with Seagate's First Counterclaim for relief against Chartis Specialty		
14 15	(Docket Item No. 325); and		
16	WHEREAS, on October 1, 2010, Plaintiffs, including Chartis Specialty, timely filed a		
17	notice of appeal (Docket No. 331); and		
18	WHEREAS, Chartis Specialty has obtained a bond in the amount of \$3,910,033.08, which		
19	represents 125% of the amount of the Judgment; and		
20	<b>WHEREAS</b> , Seagate has agreed that this amount is sufficient and has approved the form of		
21	the bond and administrative motion for approval thereof. A copy of the bond is attached hereto as		
22 23	Exhibit A and will be filed with the Court upon approval by the Court.		
24	<b>NOW THEREFORE</b> , pursuant to Civil L.R. 7-12, it is hereby <b>STIPULATED AND</b>		
25	AGREED by and among the Parties:		
26	1. The bond in the amount of \$3,910,033.08 is sufficient to stay execution of the		
27	judgment against Chartis Specialty; and		
28	642586 MOTION TO APPROVE SUPERSEDEAS BOND - 3 - Case No. C 04-01593 JW		

1	2. Upon the Court's approv	val of the assented-to bond amount, the judgment against
2	Chartis Specialty shall be stayed pursuant to Fed. R. Civ. P. 62(d).	
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5		
6	PURSUANT TO STIPULATION, IT	IS SO ORDERED.
7	Dated: February 15, 2011	ORRICK, HERRINGTON & SUTCLIFFE, LLP
8		
9		/s/ Daniel Weinberg
10		Daniel Weinberg Attorneys for Defendant and Counterclaimant
11		Seagate Technology LLC
12		
13	Dete 1. Determine 15, 2011	
14	Dated: February 15, 2011	DRINKER, BIDDLE & REATH, LLP
15		
16		/s/ Michael P. Pulliam Michael P. Pulliam
17		Attorneys for Plaintiffs and Counter-defendants National Union Fire Insurance Company of
18		Pittsburgh, PA and American International Underwriters Insurance Company
19		
20		
21	Dated: February 15, 2011	ROBINSON & WOOD, INC.
22		
23		/s/ Archie S. Robinson Archie S. Robinson
24		Attorneys for Plaintiff and Counter-defendant
25		American International Specialty Lines Insurance Company
26		
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28		
	642586 MOTION TO APPROVE SUPERSEDEAS BOND	- 4 - Case No. C 04-01593 JW

1	IT IS SO ORDERED.	
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3	Dated: February 17, 2010	On merela have
4 5		Hon. James Ware United States District Chief Judge
6		Diffied States District Chief Judge
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	642586 MOTION TO APPROVE SUPERSEDEAS BOND	- 5 - Case No. C 04-01593 JW