



1 TERRENCE R. McINNIS (#155416)
 2 terrence.mcinnis@troutmansanders.com
 3 THOMAS H. PROUTY (#238950)
 4 thomas.prouty@troutmansanders.com
 5 TROUTMAN SANDERS LLP
 6 5 Park Plaza, Suite 1400
 7 Irvine, CA 92614-2545
 8 Telephone: 949.622.2700
 9 Facsimile: 949.622.2739

10 *Attorneys for Third Party Defendant*
 11 *EXECUTIVE RISK INDEMNITY, INC.*

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

TROUTMAN SANDERS LLP
 5 PARK PLAZA
 SUITE 1400
 IRVINE, CA 92614 -2545

15 GENESIS INSURANCE COMPANY,
 16
 17 Plaintiff,
 18
 19 v.
 20 MAGMA DESIGN AUTOMATION,
 21 INC., et al.
 22
 23 Defendants.

Case No. 5:06-cv-05526-EJD
 Hon. Edward J. Davila

**STIPULATION EXTENDING TIME FOR
 THIRD PARTY DEFENDANT
 EXECUTIVE RISK INDEMNITY, INC. TO
 FILE INITIAL RESPONSE TO
 NATIONAL UNION'S THIRD PARTY
 COMPLAINT**

[Local Rule 6-1(a)]

24 NATIONAL UNION FIRE INSURANCE
 25 COMPANY OF PITTSBURGH, PA.,
 26
 27 Third Party Plaintiff,
 28
 29 v.
 30 EXECUTIVE RISK INDEMNITY, INC.,
 31
 32 Third Party Defendant.

33 AND RELATED COUNTERCLAIMS,
 34 CROSSCLAIMS AND THIRD-PARTY
 35 ACTIONS.

22984034v1

STIPULATION EXTENDING TIME FOR THIRD PARTY DEFENDANT EXECUTIVE RISK INDEMNITY, INC. TO FILE INITIAL RESPONSE TO NATIONAL UNION'S THIRD PARTY COMPLAINT; CASE NO. 5:06-CV-05526-EJD

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

Pursuant to Local Rule 6-1(a), Third Party Plaintiff National Union Fire Insurance Company of Pittsburgh, P.A. (“National Union”) and Third Party Defendant Executive Risk Indemnity, Inc. (“ERII”) (collectively with National Union, the “Parties”), by and through their respective counsel, hereby stipulate and agree to extend the time for ERII to answer or otherwise respond to National Union’s Amended Third-Party Complaint (Dkt. 264) as follows:

On August 4, 2014, National Union filed its original Third Party Complaint naming ERII;

On August 18, 2014, National Union filed its operative Amended Third Party Complaint against ERII, and subsequently served ERII, making ERII’s initial response due on September 2, 2014;

ERII’s counsel has requested, and National Union’s counsel has agreed to a fourteen (14) day extension of time for ERII to file its initial response to National Union’s operative Third Party Complaint, making ERII’s response due on September 16, 2014;

The Parties believe that extending the newly added ERII’s deadline to file its initial response will not alter the date of any event or any deadline already fixed by Court order or otherwise have a negative effect on the future scheduling in this action;

THEREFORE, IT IS HEREBY STIPULATED by and between the Parties’ undersigned counsel that ERII shall file its initial response to National Union’s operative Third Party Complaint on or before September 16, 2014.

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

Dated: August 29, 2014

Respectfully submitted,
TROUTMAN SANDERS LLP

By: /s/ Thomas H Prouty
Terrence R. McInnis
Thomas H. Prouty

*Attorneys for Third Party Defendant
EXECUTIVE RISK INDEMNITY, INC.*

*Pursuant to Local Rule 5-1(i)(3), Thomas
H. Prouty hereby attests to the concurrence
of the filing of this document has been
obtained from each of the other
signatories, which shall serve in lieu of
their signatures.*

Dated: August 29, 2014

LEWIS BRISBOIS BISGAAARD & SMITH
LLP

By: /s/ Paul A. Desrochers
Michael K. Johnson
Paul A. Desrochers

*Attorneys for Third Party Plaintiff
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA*