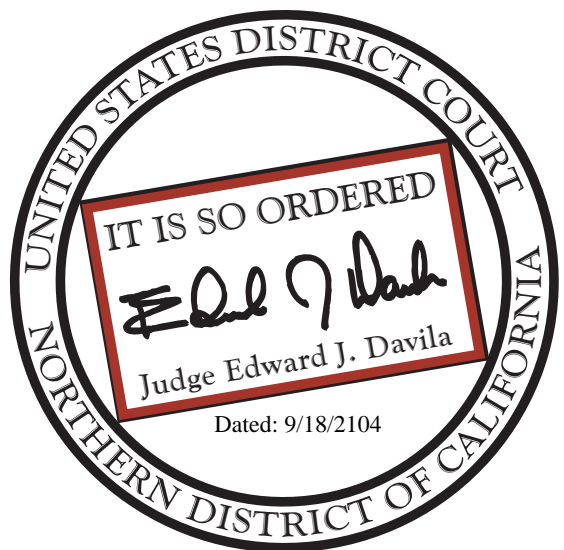


1 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
 2 MICHAEL K. JOHNSON, ESQ. (SBN 130293)
 3 Michael.Johnson@lewisbrisbois.com
 4 PAUL A. DESROCHERS, ESQ (SBN214855)
 5 Paul.Desrochers@lewisbrisbois.com
 333 Bush Street, Suite 1100
 San Francisco, CA 94104
 Tel: (415) 362.2580
 Fax: (415) 434.0882

6 Attorneys for Defendant, Cross-Defendant,
 7 Cross-Claimant and Cross- Complainant
 8 NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA



9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN JOSE DIVISION**

12 GENESIS INSURANCE COMPANY,
 13 Plaintiff,
 14 v.
 15 MAGMA DESIGN AUTOMATION, INC., et
 16 al.,
 17 Defendants.

CASE NO. 5:06-CV-05526 EJD

Hon. Edward J. Davila

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

18 NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA,
 19 Third Party Plaintiff,
 20 vs.
 21 EXECUTIVE RISK INDEMNITY, INC.,
 22 Third Party Defendant.

[Local Rule 6-1(a)]

23
 24 **AND RELATED THIRD PARTY ACTION**

26 Pursuant to Local Rule 6-1(a), Third Party Plaintiff National Union Fire Insurance
 27 Company of Pittsburgh, P.A. ("National Union") and Third Party Defendant Executive Risk
 28 Indemnity, Inc. ("ERII") (collectively with National Union, the "Parties"), by and through their

1 respective counsel, hereby stipulate and agree to further extend the time for ERII to answer or
2 otherwise respond to National Union's Amended Third-Party Complaint (Dkt. 264) as follows:

3
4 On August 4, 2014, National Union filed its original Third Party Complaint naming ERII;

5
6 On August 18, 2014, National Union filed its operative Amended Third Party Complaint
7 against ERII, and subsequently served ERII, making ERII's initial response due on September 2,
8 2014;

9
10 On August 27, 2014 ERII's counsel requested, and National Union's counsel agreed to a
11 fourteen (14) day extension of time for ERII to file its initial response to National Union's
12 operative Third Party Complaint;

13
14 On August 29, 2014 ERII and National Union executed and filed a stipulation regarding
15 their agreement under Local Rule 6-1(a) as to ERII's initial response to National Union's Third
16 Party Complaint, making ERII's response due on September 16, 2014;

17
18 On September 16, 2014, counsel for the Parties discussed the need to further extend the
19 due date for ERII's initial response to National Union's Third Party Complaint to allow for further
20 discussion of the potential for resolving the matters at issue between the Parties;

21
22 The Parties believe that further extending ERII's deadline to file its initial response by an
23 additional fourteen (14) days will not alter the date of any event or any deadline already fixed by
24 Court order or otherwise have a negative effect on the future scheduling in this action;

25
26 THEREFORE, IT IS HEREBY STIPULATED by and between the Parties' undersigned
27 counsel that ERII shall file its initial response to National Union's operative Third Party
28 Complaint on or before September 30, 2014.

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Dated: September 16, 2014

Respectfully submitted,
TROUTMAN SANDERS LLP

By: /s/ Terrence R. McInnis
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: September 16, 2014

LEWIS BRISBOIS BISGAARD & 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*