

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
2000 POWELL STREET, SUITE 900
EMERYVILLE, CALIFORNIA 94608
(510) 740-1500

1 G. EDWARD RUDLOFF, JR. (State Bar No. 56058)
2 EDWARD P. MURPHY (State Bar No. 182778)
3 ANNA A. CHOPOVA (State Bar No. 245730)
4 **RUDLOFF WOOD & BARROWS LLP**
5 2000 Powell Street, Suite 900
6 Emeryville, California 94608
7 Telephone: (510) 740-1500
8 Facsimile: (510) 740-1501
9 E-mail: erudloff@rwblaw.com
10 emurphy@rwblaw.com
11 achopova@rwblaw.com

12 Attorneys for Defendant NATIONWIDE
13 MUTUAL FIRE INSURANCE COMPANY

14 E. GERARD MANNION (State Bar No. 77287)
15 DEMIAN I. OKSENENDLER (State Bar No. 233416)
16 **MANNION & LOWE**
17 655 Montgomery Street, Suite 1200
18 San Francisco, California 94111
19 Telephone: (415) 733-1050
20 Facsimile: (415) 434-4810
21 E-Mail: gmannion@sbcglobal.net
22 doksenendler@sbcglobal.net

23 Attorneys for Plaintiff
24 TAMIKO CARRILLO

25 UNITED STATES DISTRICT COURT OF CALIFORNIA
26 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

27 TAMIKO CARRILLO,

No. C 07-01979 JF

28 Plaintiff,

**STIPULATED REQUEST FOR
ORDER CHANGING TIME;
[PROPOSED] ORDER**
[Local Rule 6-2, 7-12]

vs.

29 NATIONWIDE MUTUAL FIRE
30 INSURANCE COMPANY, NATIONWIDE
31 MUTUAL INSURANCE, ALLIED
32 INSURANCE,

Amended Complaint
Filed: 07/25/07
Trial Date: None Set

Defendants.

[Hon. Jeremy Fogel]

_____ /

26 //
27 //
28 //

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Defendant Nationwide Mutual Fire Insurance Company (“Nationwide Fire”), by and
3 through its attorneys of record, Rudloff Wood and Barrows LLP, and Plaintiff Tamiko Carrillo
4 (“Plaintiff”), by and through her attorneys of record, Mannion & Lowe, hereby stipulate:

5 WHEREAS, in response to the parties’ Stipulated Request to Change Time, this Court’s
6 September 5, 2008 Order provided for private mediation to be held by January 31, 2009; and

7 WHEREAS, the parties are presently attempting to co-ordinate a hearing date for their
8 respective motions for partial summary judgment on the issue of the duty to defend; and

9 WHEREAS, the parties have been taking the depositions of various witnesses and
10 conducting additional discovery in preparation for filing said motions for partial summary
11 judgment; and

12 WHEREAS, the parties believe that the determination of the issue of duty to defend would
13 significantly influence and potentially contribute to the future settlement of the case through the
14 ADR process; and

15 WHEREAS, the parties previous stipulations for order changing time to complete ADR
16 process were warranted by the circumstances of the case at the time and for good cause; and

17 WHEREAS, the parties agree to extend the time to complete private mediation, or another
18 form of ADR process, to May 31, 2009 to allow the resolution of the parties’ upcoming motions
19 for partial summary judgment.

20 //

21 //

22 //

23 //

24 //

25 //

26

27


28

1 THERETOFORE THE PARTIES STIPULATE AS FOLLOWS:

2 1. The parties agree to extend the deadline for completion of ADR process to May 31,
3 2009.

4
5 DATED: December 12, 2008

RUDLOFF WOOD & BARROWS LLP

6
7 By: 
8 G. Edward Rudloff, Jr.
9 Edward P. Murphy
10 Anna A. Chopova

Attorneys for Defendant NATIONWIDE
MUTUAL FIRE INSURANCE COMPANY

11 DATED: December ____, 2008

MANNION & LOWE

12
13 By: _____
14 E. Gerard Mannion
15 Demian I. Oksenendler

Attorneys for Plaintiff TAMIKO CARRILLO

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
2000 POWELL STREET, SUITE 900
EMERYVILLE, CALIFORNIA 94608
(510) 740-1500

1 THERETOFORE THE PARTIES STIPULATE AS FOLLOWS:

2 1. The parties agree to extend the deadline for completion of ADR process to May 31,
3 2009.

4
5 DATED: December __, 2008

RUDLOFF WOOD & BARROWS LLP

6
7 By: _____
8 G. Edward Rudloff, Jr.
9 Edward P. Murphy
10 Anna A. Chopova

Attorneys for Defendant NATIONWIDE
MUTUAL FIRE INSURANCE COMPANY

11 DATED: December 10, 2008

MANNION & LOWE

12
13 By: _____
14 E. Gerard Mannion
15 Damian I. Oksenendler

16 Attorneys for Plaintiff TAMIKO CARRILLO
17
18
19
20
21
22
23
24
25
26
27
28

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
2000 POWELL STREET, SUITE 900
EMERYVILLE, CALIFORNIA 94608
(510) 740-1500

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

[PROPOSED] ORDER

IT IS SO ORDERED, based on the Stipulation set forth above, and GOOD CAUSE APPEARING, that:

1. The deadline for completion of ADR is extended to May 31, 2009.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 12/15/08



THE HONORABLE JEREMY FOGEL
United States District Court
Northern District of California

RUDLOFF WOOD & BARROWS LLP
ATTORNEYS AT LAW
2000 POWELL STREET, SUITE 900
EMERYVILLE, CALIFORNIA 94608
(510) 740-1500