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Attorneys for Defendants EAST CHARLESTON, INC. and  
PACIFIC AMERICAN MANAGEMENT COMPANY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SCHLUMBERGER TECHNOLOGY  
CORPORATION, INC., a Texas Corporation;

Plaintiff,

v.

EAST CHARLESTON, INC., a California  
Corporation, and PACIFIC AMERICAN  
MANAGEMENT COMPANY, a California  
Limited Liability Corporation;

Defendants.

Case No.: 5:11-CV-02587-LHK

**STIPULATION AND ~~PROPOSED~~  
ORDER MUTUALLY DISMISSING  
TRAVELERS AND ECI/PAMCO'S  
CLAIMS WITH PREJUDICE**

RELATED CROSS AND COUNTER-CLAIMS

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1           **IT IS HEREBY STIPULATED** by and between Defendants and Counterclaimants East  
2 Charleston, Inc. and Pacific American Management Company (“ECI/PAMCO”) and Third Party  
3 Defendant Advalloy, Inc. by and through Intervenor Travelers Casualty and Surety Company fka  
4 The Aetna Casualty and Surety Company (“Travelers”), through their respective counsel  
5 (collectively, the “Parties”):

6           Pursuant to the Court's Status Conference Order of June 25, 2013 (Document 271) and Rule  
7 41(a)(2) and (c), the Parties hereby stipulate and agree as follows:

- 8           1. Travelers and ECI/PAMCO hereby mutually dismiss all of their respective claims pled in the  
9           above captioned case against each other WITH PREJUDICE; and
- 10          2. Each Party, Travelers and ECI/PAMCO, will bear its own costs, attorney's fees and  
11          expenses.

12  
13 Dated: June 26, 2013

GREBEN & ASSOCIATES

14           /s/ Jan A. Greben

15           Jan A. Greben

16           Brett A. Boon

17           Attorneys for Defendants and Counterclaimants EAST  
18           CHARLESTON, INC., a California Corporation, and  
19           PACIFIC AMERICAN MANAGEMENT COMPANY,  
20           a California Limited Liability Corporation

21  
22 Dated: June 26, 2013

LEWIS, BRISBOIS, BISGAAD & SMITH, LLP

23           /s/ Joseph A. Salazar

24           JOSEPH A. SALAZAR JR

25           Attorneys for Intervenor Travelers Casualty and Surety  
26           Company fka The Aetna Casualty and Surety Company  
27           as Alleged Insurer of Suspended Corporation Third-  
28           Party Defendant Advalloy, Inc.

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3 **[PROPOSED] ORDER**

4 The Parties having stipulated and agreed, and good cause appearing, **IT IS HEREBY**  
5 **ORDERED THAT:**

6 1. Travelers' claims against ECI/PAMCO as set forth in the pleadings in the above case  
7 are hereby dismissed **WITH** prejudice;

8 2. ECI/PAMCO's claims against Travelers as set forth in the pleadings in the above case  
9 are hereby dismissed **WITH** prejudice; and

10 3. Each party shall bear its own costs, attorney's fees and expenses.

11 Date: June 26, 2013

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14 HON. LUCY H. KOH, JUDGE FOR THE  
15 UNITED STATES DISTRICT COURT