

ORIGINAL

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11/6/10

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Attorneys for Plaintiffs CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON
SUBSCRIBING TO CONTINGENCY NON-APPEARANCE AND CANCELLATION WINDOW
POLICY NO. B0638C091985

RECEIVED

AUG 31 REC'D SUPERIOR COURT OF THE STATE OF CALIFORNIA
DEPT. 55 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

CERTAIN UNDERWRITERS AT
LLOYD'S OF LONDON SUBSCRIBING
TO CONTINGENCY NON-
APPEARANCE AND CANCELLATION
POLICY NO. B0638C091985,
Plaintiffs,

vs.

AEG LIVE LLC; THE MICHAEL
JACKSON COMPANY LLC and DOES 1-
75, inclusive,
Defendants.

Case No.: BC462973

ASSIGNED FOR ALL PURPOSES TO: THE
HONORABLE MALCOLM MACKEY

DEPT.: 55

STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE AND
HEARING ON THIRD PARTY THE
ESTATE OF MICHAEL JACKSON'S
MOTION TO QUASH DEPOSITION
SUBPOENAS; [PROPOSED] ORDER

TRIAL DATE: NONE
ACTION FILED: JUNE 6, 2011

TO THE HONORABLE COURT, TO ALL PARTIES HEREIN AND TO THEIR
ATTORNEYS OF RECORD:

Plaintiffs/Cross-defendants CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON
SUBSCRIBING TO CONTINGENCY NON-APPEARANCE AND CANCELLATION
POLICY NO. B0638C091985 (hereinafter "PLAINTIFF"), Defendant AEG LIVE, LLC
("AEG"), Defendant/Cross-complainant THE MICHAEL JACKSON COMPANY, LLC

STIPUALTION TO CONTINUE CASE MANAGEMENT CONFERENCE AND HEARING ON THIRD PARTY
THE ESTATE OF MICHAEL JACKSON'S MOTION TO QUASH DEPOSITION SUBPOENAS;
[PROPOSED] ORDER

FILED
LOS ANGELES SUPERIOR COURT

SEP 07 2011

JOHN J. VERNER, CLERK

BY E. VERNER, DEPUTY

RECEIVED

AUG 30 2011

CIT. CASE: BC462973 LEA/DEF#:
RECEIPT #: CCH477728029
DATE PAID: 08/30/11 02:06:33 PM
PAYMENT: \$20.00
RECEIVED: 08/10
CHECK: \$20.00
CASH: \$0.00
CHANGE: \$0.00

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("LLC"), and third-party the ESTATE OF MICHAEL JACKSON (hereinafter "ESTATE"), by and through their respective counsel of record herein, hereby agree and stipulate as follows:

The parties to this stipulation have met and conferred and agree that a continuance of both: 1) the case management conference (currently scheduled for September 14, 2011); and 2) the hearing on the ESTATE's Motion to Quash Deposition Subpoenas for production of medical records, presently set for September 16, 2011, is necessary in order to allow sufficient time for newly named cross-defendants, North American Capacity Insurance Co. and Homeland Insurance Company of New York to appear in this action. Counsel for PLAINTIFF has been contacted by attorney Craig Kline, Esq. who has confirmed that he will be representing the aforementioned cross-defendants in this action.

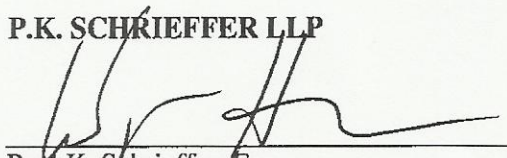
Accordingly, IT IS AGREED AS FOLLOWS:

1. That the Case Management Conference scheduled for September 14, 2011 be continued at least 30 days to a date convenient for the Court; and
2. That the motion to quash filed by the ESTATE, currently scheduled for September 16, 2011, also be continued to the date of the new case management conference to avoid the necessity of multiple appearances.
3. This Stipulation may be executed in any number of counterparts, in original or by facsimile, and any such facsimile signatures shall be sufficient to bind the parties hereto.

Dated: August 30, 2011

P.K. SCHRIEFER LLP

By

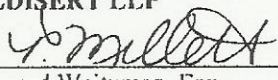

Paul K. Schrieffer, Esq.
Reid L. Denham, Esq.
Wayne H. Hammack, Esq.
Attorneys for Plaintiffs, CERTAIN
UNDERWRITERS AT LLOYD'S OF
LONDON SUBSCRIBING TO
CONTINGENCY NON-APPEARANCE
AND CANCELLATION POLICY NO.
B0638C091985

PK. SCHRIEFER LLP
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Telephone: (626) 373-2444
Facsimile: (626) 974-8403

1 Dated: August 30, 2011

KINSELLA WEITZMAN ISER KUMP &
ALDISERT LLP


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3 By


Howard Weitzman, Esq.
Patricia A. Millett, Esq.
Attorneys for Defendant/Cross-
complainant, THE MICHAEL JACKSON
COMPANY LLC and Third Party THE
ESTATE OF MICHAEL JACKSON

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8 Dated: August 30, 2011

O'MELVENY & MYERS LLP

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11 By


Marvin S. Putnam, Esq.
Jessica L. Stebbins, Esq.
Attorneys for Defendants, AEG Live, LLC

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STIPUALTION TO CONTINUE CASE MANAGEMENT CONFERENCE AND HEARING ON THIRD PARTY
THE ESTATE OF MICHAEL JACKSON'S MOTION TO QUASH DEPOSITION SUBPOENAS;
[PROPOSED] ORDER



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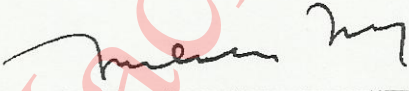
[PROPOSED] ORDER

IT IS HEREBY ORDERED THAT:

1. The Case Management Conference scheduled for September 14, 2011 is hereby
OCT 2 8 2011
continued to _____, 2011.
2. That the hearing on the motion to quash filed by the ESTATE, currently scheduled
OCT 2 8 2011
for September 16, 2011, is also be continued to _____, 2011, the date of the
Case Management Conference.

SO ORDERED.

SEP 07 2011
DATED: _____


JUDGE OF THE SUPERIOR COURT
MALCOLM H. MACKEY

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PROOF OF SERVICE

Assigned for all purposes to Hon. Malcolm H. Mackey, Dept. 55 Los Angeles Superior Court, Central District, 111 No. Hill St., Los Angeles, CA 90012; Phone# (213) 974-5683

Certain Underwriters v. AEG Live LLC, et al., Case No.: BC462973

I am employed in the county of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within entitled action; my business address is 100 N. Barranca Avenue, Suite 1100, West Covina, California 91791.

On August 30, 2011 I served the foregoing document(s) described as **STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE AND HEARING ON THIRD PARTY, THE ESTATE OF MICHAEL JACKSON'S MOTION TO QUASH DEPOSITIONS SUBPOENAS' [PROPOSED] ORDER** placing the true copies thereof enclosed in sealed envelopes addressed as follows:

Howard Weitzman
Patricia A. Millett
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Blvd., 3rd Floor
Santa Monica, CA 90401
Tel: (310) 566-9800
Fax: (310) 566-9850

Attorneys for Defendants, AEG Live LLC

Marvin Putnam, Esq.
Jessica L. Stebbins, Esq.
O'Melveny & Myers LLP
199 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067
Tel: (310) 553-6700
Fax: (310) 246-6779

Attorneys for Defendant, The Michael Jackson Company LLC

(XX) BY MAIL: I am "readily familiar" with the firm's practice of collection and processing correspondence and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at West Covina, California in the ordinary course of business.

() BY PERSONAL SERVICE: I delivered such envelope(s) by hand to the office(s) of the addressee(s) noted above.

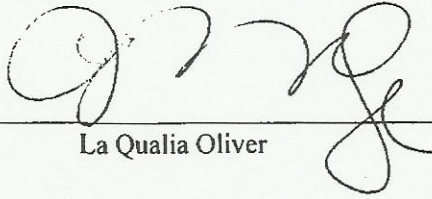
() BY FEDERAL EXPRESS: I caused said envelope(s) to be sent by Federal Express to the address(s) noted above.

() BY FACSIMILE: I caused said document(s) to be transmitted by facsimile during

() BY ELECTRONIC EMAIL: Based on a court or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the email addresses listed in the service list below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful during normal business hours of 8:00 a.m. to 5:00 p.m. to the addressee(s) noted above.

Executed on August 30, 2011, at West Covina, California.

(XX) STATE I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.


La Qualia Oliver

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9/26/11

WWW.TeamMichaelJackson.Com