

BEST BEST & KRIEGER LLP
ATTORNEYS AT LAW
2001 N. MAIN STREET, SUITE 390
WALNUT CREEK, CALIFORNIA 94596

1 GENE TANAKA, Bar No. 101423
gene.tanaka@bbkllaw.com
2 JOHN H. HOLLOWAY, Bar No. 181190
john.holloway@bbkllaw.com
3 WENDY Y. WANG, Bar No. 228923
wendy.wang@bbkllaw.com
4 BEST BEST & KRIEGER LLP
2001 N. Main Street
5 Suite 390
Walnut Creek, California 94596
6 Telephone: (925) 977-3300
Facsimile: (925) 977-1870
7

8 Attorneys for Third-Party Defendants
9 COUNTY OF LOS ANGELES AND LOS
ANGELES COUNTY DEVELOPMENT
10 AUTHORITY, erroneously named as Housing
Authority of the County of Los Angeles

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13
14 CALIFORNIA DEPARTMENT OF
TOXIC SUBSTANCES CONTROL and
15 the TOXIC SUBSTANCES CONTROL
ACCOUNT,

16 Plaintiffs,

17 v.

18 NL INDUSTRIES, INC. a New Jersey
19 corporation; et al.,

20 Defendant.

21 NL INDUSTRIES, INC.,

22 Third-Party Plaintiff,

23 v.

24 EXXON MOBIL CORPORATION, a
25 New Jersey corporation; et al.,

26 Third-Party Defendants.
27
28

Case No. 2:20-CV-11293-SVW-JPR

Honorable Stephen V. Wilson
Courtroom 10A

**STIPULATION EXTENDING
THE TIME OF COUNTY OF LOS
ANGELES AND LOS ANGELES
COUNTY DEVELOPMENT
AUTHORITY TO RESPOND TO
THE THIRD-PARTY
COMPLAINT FILED BY NL
INDUSTRIES, INC. BY 28 DAYS**

3RD Party Complaint Served: 08/31/21
Response Deadline: 09/21/21
Proposed New Deadline: 10/19/21

Action Filed: December 14, 2020

BEST BEST & KRIEGER LLP
ATTORNEYS AT LAW
2001 N. MAIN STREET, SUITE 300
WALNUT CREEK, CALIFORNIA 94596

STIPULATION

1
2 Third-Party Defendants County of Los Angeles (“County”) and Los Angeles
3 County Development Authority (“LACDA”), erroneously named as Housing
4 Authority of the County of Los Angeles, and Defendant and Third-Party Plaintiff
5 NL Industries, Inc. (“NL Industries”), by and through their attorneys, stipulate as
6 follows:

7 1. On August 31, 2021, NL Industries served the County and LACDA
8 with a Summons and Third-Party Complaint in the above-captioned matter. The
9 County’s and LACDA’s responsive pleading to the Third-Party Complaint is
10 currently due on September 21, 2021.

11 2. Based on the court docket associated with this matter, the case
12 involves multiple parties, claims, and counterclaims, with complex legal and factual
13 issues arising from alleged environmental contamination and cost recovery claims
14 under the Comprehensive Environmental Response, Compensation, and Liability
15 Act (“CERCLA”). The original Complaint alleges five claims for relief against ten
16 defendants, and contains 179 paragraphs of supporting allegations. The recently
17 served Third-Party Complaint asserts four claims for relief against more than 30
18 third-party defendants, and contains 248 paragraphs of supporting allegations.

19 3. Considering the complex factual and legal issues in this matter, the
20 County and LACDA will need additional time to adequately assess the claims for
21 relief and supporting allegations, and to properly respond to the Third-Party
22 Complaint.

23 NOW, THEREFORE, IT IS STIPULATED AND AGREED, by and between
24 the parties hereto, through their respective undersigned attorneys of record, that the
25 time for the County and LACDA to answer or otherwise respond to NL Industries’s
26 Third-Party Complaint is extended by 28 days, from September 21, 2021, to October
27 19, 2021.
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1 Dated: September 15, 2021

BEST BEST & KRIEGER LLP

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By: /s/ Wendy Y. Wang

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GENE TANAKA
JOHN H. HOLLOWAY
WENDY Y. WANG

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Attorneys for Third-Party
Defendants

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COUNTY OF LOS ANGELES
AND LOS ANGELES COUNTY
DEVELOPMENT AUTHORITY

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9 Dated: September 15, 2021

LAW OFFICES OF JOEL L. HERZ

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By: /s/ Joel L. Herz

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JOEL L. HERZ
Attorneys for Third-Party Plaintiff
NL INDUSTRIES, INC.

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SIGNATURE ATTESTATION

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Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Wendy Y. Wang, attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

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Dated: September 15, 2021

/s/ Wendy Y. Wang

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Wendy Y. Wang

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