

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

WESTERN WORLD INSURANCE
COMPANY,

Plaintiff,

v.

NARCONON OF GEORGIA, INC., ET
AL,

Defendants.

CIVIL ACTION

FILE NO.: 1:12-cv-2117-AT

**RESPONSE OF WESTERN WORLD INSURANCE COMPANY TO
DEFENDANT NONPROFITS' INSURANCE ALLIANCE OF
CALIFORNIA'S MOTION TO STAY INITIAL DISCLOSURE
OBLIGATIONS AND DISCOVERY AGAINST IT**

COMES NOW Western World Insurance Company ("Western World"), Plaintiff in the above-styled action, by and through counsel, and hereby responds to Defendant Nonprofits' Insurance Alliance of California's Motion to Stay Initial Disclosure Obligations and Discovery Against It, and would show the Court as follows:

On November 21, 2012, Defendant Nonprofits' Insurance Alliance of California's Motion to Stay Initial Disclosure Obligations and Discovery Against It was filed along with a brief in support thereof. (See Docket, Documents, No. 41 and 41-1.)

Western World Insurance denies that it lacks standing to bring the claims it has asserted against Nonprofits' Insurance Alliance of California ("NIAC") and also denies that this Court lacks personal jurisdiction over NIAC. In response to such allegations, Western World incorporates herein by reference its Response of Western World Insurance Company to Nonprofits' Insurance Alliance of California's Motion to Dismiss, filed in this matter.

Without waiving such denials, Western World consents to the stay requested by NIAC in its Motion to Stay Initial Disclosure Obligations and Discovery Against It. Western World reserves the right to file a similar motion staying discovery and disclosure obligations against it should it deem necessary to do so.

This 10th day of December, 2012.

s/STEPHEN G. SMITH, JR.
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CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2012, I electronically **RESPONSE**
OF WESTERN WORLD INSURANCE COMPANY TO DEFENDANT
NONPROFITS' INSURANCE ALLIANCE OF CALIFORNIA'S MOTION
TO STAY INITIAL DISCLOSURE OBLIGATIONS AND DISCOVERY
AGAINST IT with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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THIS IS TO CERTIFY that, pursuant to LR 5.1 B, NDGa., the above document was prepared in Times New Roman, 14 pt.

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