

SUPREME COURT
FILED

JUN 18 2018

Jorge Navarrete Clerk

Case No.: S244737

**In The Supreme Court
of the State of California**

MONTROSE CHEMICAL CORPORATION OF CALIFORNIA, Deputy

Petitioner,

v.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA,
COUNTY OF LOS ANGELES**

Respondent;

CANADIAN UNIVERSAL INSURANCE COMPANY, INC., et

al.,

Real Parties In Interest.

**After a Decision by the Court of Appeal,
Second Appellate District, Division Three Civil Case No. B272387
Los Angeles County Superior Court Case No. BC 005158
Honorable Elihu Berle, Judge Presiding**

**Providence Washington Insurance Company as successor by way
of merger to Seaton Insurance Company, fka Unigard Security
Insurance Company, fka Unigard Mutual Insurance Company's
JOINDER IN ANSWERING BRIEF ON THE MERITS**

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Unigard Mutual Insurance Company**

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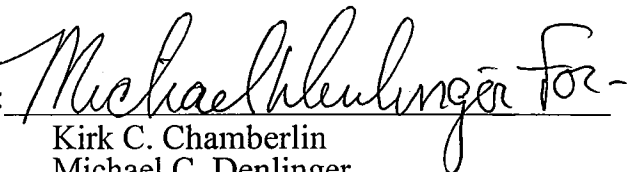
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Real Party In Interest Providence Washington Insurance Company as successor by way of merger to Seaton Insurance Company, formerly known as Unigard Security Insurance Company, formerly known as Unigard Mutual Insurance Company, joins in the Answering Brief on the Merits of Continental Casualty Company, Columbia Casualty Company, American Centennial Insurance Company and Lamorak Insurance Company except to the extent the use of the phrases “one giant uber policy” or “uber policy” could potentially be construed as overriding the policy language of each policy. Each policy must be interpreted according to its terms and conditions.

Dated: June 18, 2018

CHAMBERLIN & KEASTER LLP

By:  Michael Denlinger for
Kirk C. Chamberlin
Michael C. Denlinger
Attorneys for Real Party In Interest
Providence Washington Insurance Company as
successor by way of merger to Seaton Insurance
Company, formerly known as Unigard Security
Insurance Company, formerly known as
Unigard Mutual Insurance Company

CERTIFICATE OF WORD COUNT

I certify, pursuant to rule 8.504(d)(1), California Rules of Court, that the attached Joinder to Answering Brief on the Merits contains 94 words as measured by the word count of the computer program (Microsoft Word) used to prepare this Joinder.

Dated: June 18, 2018

CHAMBERLIN & KEASTER LLP

By: Michael Chamberlin for
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successor by way of merger to Seaton Insurance
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Insurance Company, formerly known as
Unigard Mutual Insurance Company

PROOF OF SERVICE

*Montrose Chemical Corporation Of California, etc. v. The Aetna Casualty
&*

Surety Company, etc., et al.

Case No.: BC 005158

Supreme Court Case No.: S236148

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

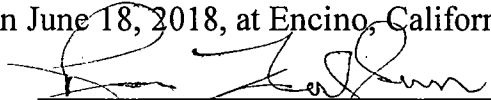
I am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. My business address is 16000 Ventura Boulevard, Suite 700, Encino, CA 91436-2758.

On the date set forth below, I served the foregoing document(s) described as: **JOINDER IN ANSWERING BRIEF ON THE MERITS** on all interested parties in this action through the use of the website maintained by TrueFiling. I caused the foregoing document to be transmitted to TrueFiling for electronic service in the following manner:

BY ELECTRONIC SERVICE: I provided the document listed above electronically to TrueFiling through the Truefiling website pursuant to the instructions on that website.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 18, 2018, at Encino, California.



Ranoa Fulghum

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<p>Theodore J. Boutrous, Jr. tboutrous@gibsondunn.com Julian W. Poon jpoon@gibsondunn.com Jeremy S. Smith Jssmith@gibsondunn.com Madeleine McKenna mmckenna@gibsondunn.com Gibson Dunn & Crutcher LLP 333 South Grand Avenue Los Angeles, California 90071-3197 Tele: 213-229-7000 Fax: 213-229-7520</p>	<p>Attorneys for Continental Casualty Company, Columbia Casualty Company, American Centennial Insurance Company, and Lamorak Insurance Company</p>

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is **16000 Ventura Boulevard, Suite 700, Encino, California 91436-2758**. On the date shown below, I served the foregoing document described as:

JOINDER IN ANSWERING BRIEF ON THE MERITS by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

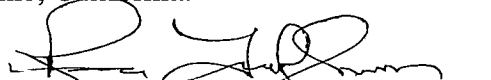
- BY OVERNIGHT DELIVERY:** I deposited in a box or other facility regularly maintained by an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, the above described document, in an envelope designated by the said express service carrier, with delivery fees paid or provided for.

Honorable Elihu Berle
Superior Court of the State of California, for the County of Los Angeles
Central Civil West Courthouse
600 South Commonwealth Avenue, Department "323"
Los Angeles, CA 90005

California Court of Appeal
Second Appellate District, Division 3
300 South Spring Street, Floor 2, North Tower
Los Angeles, CA 90013

- I declare that I am employed in the office of a member of the Bar, or permitted to practice before this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 18, 2018, at Encino, California.


Ranoa Fulghum