

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 10<sup>th</sup> day of December, 2012.

s/STEPHEN G. SMITH, JR.  
Georgia Bar No. 795287  
For the Firm  
Attorney for Plaintiff  
DENNIS, CORRY, PORTER & SMITH, L.L.P.  
3535 Piedmont Road, NE  
14 Piedmont Center, Suite 900  
Atlanta, Georgia 30305-4611  
Telephone:(404) 365-0102  
Facsimile: (404) 365-0134

**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:

Herman Fussell, Esq.  
Halsey G. Knapp, Jr., Esq.  
Foltz Martin, LLC  
3525 Piedmont Road, NE  
Five Piedmont Center, Suite 750  
Atlanta, GA 30305

Thomas M. Barton, Esq.  
Aaron P.M. Tady, Esq.  
Coles Barton LLP  
150 South Perry Street  
Suite 100  
Lawrenceville, GA 30046

Jeffrey R. Harris, Esq.  
Darren W. Penn, Esq.  
Harris Penn Lowry DelCampo, LLP  
400 Colony Square  
1201 Peachtree St., N.E.  
Suite 900  
Atlanta, Georgia 30361

David S. Bills, Esq.  
David S. Bills, P.C.  
1932 North Druid Hills Road, N.E.  
Suite 200  
Atlanta, GA 30319

s/STEPHEN G. SMITH, JR.  
Georgia Bar No. 795287  
For the Firm  
Attorney for Plaintiff

DENNIS, CORRY, PORTER & SMITH, L.L.P.  
3535 Piedmont Road, NE  
14 Piedmont Center, Suite 900  
Atlanta, Georgia 30305-4611  
Telephone: (404) 365-0102  
Facsimile: (404) 365-0134  
Email: ssmith@dcplaw.com

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

s/STEPHEN G. SMITH, JR.  
Georgia Bar No. 795287  
For the Firm  
Attorneys for Plaintiff

DENNIS, CORRY, PORTER & SMITH, L.L.P.  
3535 Piedmont Road, NE  
14 Piedmont Center, Suite 900  
Atlanta, Georgia 30305-4611  
Telephone: (404) 365-0102  
Facsimile: (404) 365-0134  
Email: ssmith@dcplaw.com