

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JOHN LAING,

Plaintiff,

v.

BP, P.L.C.; BP EXPLORATION &
PRODUCTION, INC.; BP PRODUCTS NORTH
AMERICA, INC.; BP AMERICA, INC.,

Defendants.

CASE NO. 4:14-cv-02386-LHR

JOINT NOTICE OF SETTLEMENT & MOTION FOR CONTINUANCE

Plaintiff John Laing and Defendants BP p.l.c., BP Exploration & Production Inc., BP Products North America Inc., and BP America Inc. (collectively, “Defendants”), file this Notice of Settlement pursuant to Local Rule 16.3 and the Court’s Procedures and respectfully state as follows:

1. The deadline to submit the parties’ joint discovery/case management plan in this matter is September 16, 2014. The Initial Pretrial and Scheduling Conference is set for September 26, 2014 at 10:00 a.m.
2. Plaintiff and Defendants have reached a settlement agreement that will resolve all claims that have been asserted in this case.
3. The parties are in the process of finalizing their settlement agreement and will submit a stipulation of dismissal and proposed agreed final judgment to the Court within thirty days of this Notice pursuant to the Court’s Procedures.

4. Accordingly, the parties seek a thirty-day continuance of this matter, its associated deadlines, and the initial pre-trial conference, to allow time for the parties to finish finalizing the settlement agreement and drafting the accompanying motion for dismissal.

Dated: September 16, 2014

Respectfully submitted,

OF COUNSEL:

Paul D. Collier
Adam M. Kaufmann
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 862-2000 (Tel)
(312) 862-2200 (Fax)
paul.collier@kirkland.com
adam.kaufmann@kirkland.com

Georgia L. Lucier
Southern District Bar No. (589122)
Texas Bar No. 24043523
ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, Texas 77002
Telephone: (713) 220-4200
Facsimile: (713) 220-4285
glucier@andrewskurth.com

/s/ Thomas W. Taylor
Thomas W. Taylor
Southern District Bar No. (3906)
Texas Bar No. 19723875
ttaylor@andrewskurth.com
ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, Texas 77002
Telephone: (713) 220-4200
Facsimile: (713) 220-4285

**ATTORNEYS FOR DEFENDANTS BP, P.L.C., BP
EXPLORATION & PRODUCTION, INC., BP
PRODUCTS NORTH AMERICA, INC. AND BP
AMERICA, INC.**

/s/ Clifton C. Curry, Jr.
CLIFTON C. CURRY, JR., ESQUIRE
CCCSERVICE@CURRYLAWGROUP.COM
Clif.Curry@currylawgroup.com
Florida Bar No.: 0338915
LOUIS D. LAZARO, ESQUIRE
LDLSERVICE@CURRYLAWGROUP.COM
Louis.Lazaro@currylawgroup.com
Florida Bar No.: 116378
Copy: Beth.Musolino@currylawgroup.com
Curry Law Group, P.A.
P.O. Box 1143
Brandon, Florida 33509-1143
(813) 653-2500/bm
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served by electronic CM/ECF filing, on this 16th day of September, 2014 to all counsel of record.

/s/ Thomas W. Taylor
Thomas W. Taylor