

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**In Re: KATRINA CANAL
BREACHES CONSOLIDATED
LITIGATION**

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**CIVIL ACTION
NO.: 05-4182 “K”(2)

JUDGE DUVAL

MAGISTRATE JUDGE WILKINSON**

**PERTAINS TO: INSURANCE
Vanderbrook, No. 05-6323**

**DEFENDANT THE STANDARD FIRE INSURANCE COMPANY’S
MOTION FOR ENTRY OF FINAL JUDGMENT**

Pursuant to Fed. R. Civ. P. 58(d), Defendant The Standard Fire Insurance Company (“Standard Fire”), incorrectly named as Travelers Insurance Company and St. Paul Travelers Insurance Company, respectfully moves for entry of final judgment in its favor in the Vanderbrook case, in accordance with the August 2, 2007 opinion of the U.S. Court of Appeals for the Fifth Circuit. The grounds for this motion, which are more fully stated in the accompanying memorandum of law, are that the Fifth Circuit’s decision, which overturned this Court’s denial of Standard Fire’s motion for judgment on the pleadings, is completely dispositive of this case.

WHEREFORE, Standard Fire respectfully requests that a final judgment be entered in its favor.

Respectfully submitted,

/s/ Seth A. Schmeeckle

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**Attorneys for The Standard Fire Insurance
Company (incorrectly named as Travelers
Insurance Company and St. Paul Travelers
Insurance Company)**

CERTIFICATE OF SERVICE

I hereby certify that, on September 28, 2007, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Seth A. Schmeeckle
Seth A. Schmeeckle