

1 **John C. Kiehlmeier, Esq. (SBN: 124083)**
 2 **LAW OFFICES OF JOHN C. KIEHLMEIER**
 3 **P. O. Box 1144**
 4 **Corona del Mar, California 92625**
 5 **Telephone: (949) 274-4614**
 6 **Attorney for defendants**
 7 **(see signature page)**

8
 9 **UNITED STATES DISTRICT COURT**
 10 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

12 CAROLINA CASUALTY INSURANCE)	CASE NO. 1:10-CV-0475-OWW-GSA
13 COMPANY, an Iowa corporation,)	
)	
14 Plaintiffs,)	
)	
15 vs.)	
)	
)	
17 TECH LOGISTICS CORP. DBA SYSTEMS)	STIPULATION AND (PROPOSED)
18 LOGISTICS, INC., a Texas corporation;)	ORDER RE: EXTENSION OF TIME
19 CONCEPCION GARCIA, an individual;)	FOR DEFENDANTS TO RESPOND TO
20 QUETZAL GARCIA, a minor child; ELISEO)	COMPLAINT
21 ONTIVEROS VALDEZ, an individual; AGRI-)	[Local Rule 144, Fed. R. Civ. P. 6]
22 COMM EXPRESS, INC., a California)	
23 corporation; and TRUCKING EQUIPMENT)	
24 COMPANY, INC., a Wisconsin corporation,)	
)	
25 Defendants.)	

26 **IT IS HEREBY STIPULATED** by and between Howard Wollitz, Esq., Charlston, Revich & Wollitz
 27 LLP, counsel for Plaintiff **CAROLINA CASUALTY INSURANCE COMPANY**, (hereinafter "Plaintiff"),
 28 and John C. Kiehlmeier, Esq., Law Offices of John C. Kiehlmeier, counsel for Defendants **TECH**
LOGISTICS CORPORATION d/b/a SYSTEMS LOGISTICS SERVICES, SYSTEMS LOGISTICS,

1 **INC., AGRI-COMM EXPRESS, INC., TRUCKING EQUIPMENT COMPANY, INC., and ELISEO**
2 **ONTIVEROS VALDEZ** (hereinafter collectively “Defendants”) , as follows:

3
4 1. Plaintiff has no objection to the extension of time requested by Defendants in the Affidavit of John
5 C. Kiehlmeier filed on 4-12-10.

6 2. The failure of counsel for Plaintiff to respond to defense counsel’s email of 4-12-10 as described
7 in the Affidavit of John C. Kiehlmeier filed on 4-12-10 was due to an addressing error in the email.

8 3. The failure of counsel for Plaintiff to respond to defense counsel’s voice mail message left on
9 4-12-10 was unintentional.

10 2. All defendants shall have an extension of time to respond to plaintiff’s complaint up to
11 and including May 4, 2010.

12
13 **SO STIPULATED.**

14 **Dated: April 13, 2010.**

CHARLSTN, REVICH & WOLLITZ LLP

16 By: /s/ Howard Wollitz
17 **HOWARD WOLLITZ, ESQ.**
18 **Attorney for Plaintiff**
ACE AMERICAN INSURANCE COMPANY

19 **Dated: April 13, 2010.**

LAW OFFICES OF JOHN C. KIEHLMEIER

22 By: /s/ John C. Kiehlmeier
23 **JOHN C. KIEHLMEIER, ESQ.**
24 **attorney for Defendants,**
25 **TECH LOGISTICS CORPORATION d/b/a SYSTEMS**
26 **LOGISTICS SERVICES, SYSTEMS LOGISTICS,**
27 **INC., AGRI-COMM EXPRESS, INC., TRUCKING**
28 **EQUIPMENT COMPANY, INC., and ELISEO**
ONTIVEROS VALDEZ

ORDER

In consideration of the Stipulation of the parties set forth above, the time for defendants
TECH LOGISTICS CORPORATION d/b/a SYSTEMS LOGISTICS SERVICES, SYSTEMS
LOGISTICS, INC., AGRI-COMM EXPRESS, INC., TRUCKING EQUIPMENT COMPANY, INC.,
and ELISEO ONTIVEROS VALDEZ to respond to plaintiff's complaint on file in the instant matter is
hereby extended up to and including May 4, 2010.

IT IS SO ORDERED.

Dated: April 14, 2010

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE