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9 Attorneys for Plaintiff **MARTINI E RICCI**
10 **IAMINO S.P.A. – CONSORTILE SOCIETA AGRICOLA**

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 MARTINI E RICCI IAMINO S.P.A. –
14 CONSORTILE SOCIETA AGRICOLA, an
15 Italian Company,

16 Plaintiff,

17 vs.

18 TRINITY FRUIT SALES COMPANY, INC., a
19 California Corporation, and DOES 1-20,

20 Defendants.

Case No: 1:13-CV-00276-AWI-SAB

**STIPULATION AND REQUEST TO
CONTINUE DISPOSITIVE MOTION
DATE AND TRIAL DATE;**

21 Pursuant to L.R. 144 and Fed. Rules Civ. Proc. 6, the parties to this action request a
22 continuance of the dispositive motion due date (currently January 15, 2014) and the pre-trial and
23 trial dates for approximately ninety (90) days.

24 **A. Good Cause Supporting Continuance**

25 After certain information was disclosed in discovery, the parties began discussions of an
26 out-of-court resolution of this action. The parties are hopeful that with an additional ninety (90)
27 days they may reach a settlement of their disputes.

28 Given the current deadlines, Plaintiff anticipates filing a dispositive motion on or before
January 15, 2014. If the dispositive motion does not resolve the matter, the current estimate for
trial is four (4) days.

Allowing the parties to continue their settlement discussions will obviate the need for
consumption of court time with respect to a dispositive motion and/or trial.

1 **B. Prior Extensions**

2 No prior extensions have been requested nor granted.

3 **C. Current and Proposed Schedule**

4 The current and proposed schedule is as follows:

<i>Event</i>	<i>Current Schedule</i>	<i>Proposed Schedule</i>
Dispositive Motions	January 15, 2014	April 15, 2014
Pre-Trial Conference	April 9, 2014, 8:30 a.m.	July 9, 2014, 8:30 a.m.
Trial	May 20, 2014, 9:00 a.m.	August 19, 2014, 9:00 a.m.

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9 The parties request the Court grant the requested continuance to allow for the opportunity
10 of settlement.

11 IT IS SO STIPULATED.

12
13 Dated: January 8, 2014 BRANSON, BRINKOP, GRIFFITH & STRONG LLP

14
15 By: /s/ John R. Campo
16 JOHN R. CAMPO
17 Attorneys for Plaintiff
MARTINI E RICCI IAMINO S.P.A. –
CONSORTILE SOCIETA AGRICOLA

18 Dated: January 8, 2014 MEUERS LAW FIRM, P.L.

19
20 By: /s/ Steven E. Nurenberg (as authorized on January 8, 2014)
21 LAWRENCE H. MEUERS
22 STEVEN E. NURENBERG
Attorneys for Defendant
TRINITY FRUIT SALES COMPANY, INC.

23 **ORDER**

24 The Proposed Schedule shown above is adopted as the schedule of this action.

25
26 IT IS SO ORDERED.

27 Dated: January 8, 2014

28 
SENIOR DISTRICT JUDGE

BRANSON BRINKOP GRIFFITH & STRONG LLP

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