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6 Attorneys for Defendant
 7 TEXAS EASTERN OVERSEAS, INC.

8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

11	AMERIPRIDE SERVICES INC.,)	Case No. 2:00-CV-00113-LKK JFM
)	(Consolidated)
12	Plaintiff,)	
)	
13	v.)	JOINT STIPULATION AND ORDER
)	CONTINUING THE HEARING ON
14	VALLEY INDUSTRIAL SERVICES, INC., a)	PLAINTIFF AMERIPRIDE SERVICES
	former California corporation, et al.,)	INC.'S MOTION FOR SUMMARY
15	Defendants.)	JUDGMENT AND BRIEFING
16	_____)	DEADLINES
)	
17	HUHTAMAKI FOODSERVICE, INC.,)	Date: February 14, 2011
)	Time: 10:00 a.m.
18	Plaintiff,)	Dept.: 4
)	Hon. Lawrence K. Karlton
19	v.)	Trial Date: January 18, 2012
)	Discovery Cut Off: May 1, 2011
20	AMERIPRIDE SERVICES INC.,)	Motion Cut Off: July 1, 2011
)	
21	Defendant.)	
22	_____)	

23 **I. INTRODUCTION**

24 The parties to the above-entitled action, by and through their respective counsel, hereby
 25 stipulate and request the Court to continue the hearing on PLAINTIFF AMERIPRIDE SERVICES
 26 INC.'s ("AMERIPRIDE") Motion for Summary Judgment (Dkt. 698) and the associated briefing
 27 schedule.

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II. RECITALS

On January 7, 2011, AMERIPRIDE filed a Motion for Summary Judgment. The hearing on the motion is currently set for February 14, 2011. Under this hearing date, the opposition to this motion by Defendant, Texas Eastern Overseas, Inc., (“TEO”) must be filed by January 31, 2011. TEO’s counsel has a trial starting February 1, 2011 in California Superior Court in the County of Solano. The case name is *Lisa Edwards v. Michael Johnson, et. al.* case number FCS 032472. Counsel for Defendant expects the trial to take several weeks and anticipates the trial continuing through the date of the hearing on AMERIPRIDE’s Motion for Summary Judgment. As a result, counsel for AMERIPRIDE has graciously agreed to move the hearing date and briefing schedule to provide counsel for TEO the time to properly oppose this motion.

In light of this agreement the parties have agreed to an alternative hearing date and briefing schedule, IT IS HEREBY STIPULATED by and between the parties hereto as follows:

The hearing on Plaintiff AMERIPRIDE’s Motion for Summary Judgment will be continued to April 25, 2011.

TEO’s opposition to the Motion for Summary Judgment shall be due on or before March 4, 2011.

AMERIPRIDE’s reply brief in support of its Motion for Summary Judgment shall be due on or before April 7, 2011.

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1 Dated: January 19, 2011 WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

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By: /s/Edward Garson
RONALD S. BUSHNER
EDWARD P. GARSON
BERNARD GEHLHAR
EMILY M. WEISSENBERGER
Attorneys for Defendant
TEXAS EASTERN OVERSEAS, INC.

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8 Dated: January 19, 2011 HUNSUCKER GOODSTEIN & NELSON PC

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By: /s/Maureen B. Hodson
PHILIP C. HUNSUCKER
BRIAN L. ZAGON
MAUREEN B. HODSON
Attorneys for Plaintiff
AMERIPRIDE SERVICES INC.

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15 Good Cause Appearing,
16 IT IS SO ORDERED.

17 Dated: January 21, 2011

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LAWRENCE K. KARLTON
SENIOR JUDGE
UNITED STATES DISTRICT COURT

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