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CONTRACTING COMPANY, INC.,
6 MASON RICHARDSON,
and RENÉ VERCROYSEN

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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

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11 CALIFORNIA SPORTFISHING
12 PROTECTION ALLIANCE, a non-profit
corporation,

13 Plaintiff,

14 v.

15 BALDWIN CONTRACTING COMPANY,
16 INC., a California corporation, BCJ SAND
AND ROCK, INC., a California corporation,
17 J. BRAD SLENDER, an individual, TED
HALE, an individual, MASON
18 RICHARDSON, an individual, and RENÉ
VERCRUYSEN, an individual,

19 Defendants.

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21 The parties to the above-entitled action hereby stipulate that good cause exists to
22 continue the due date for Defendants to file a responsive pleading because the parties are
23 actively engaged in settlement discussions, and have conducted an informal settlement-protected
24 site inspection. The parties are continuing to make progress on their settlement discussions and
25 request this additional time with the intention of resolving the remaining differences.

26 Pursuant to Local Rule 143(b), the parties present the following stipulation for
27 consideration by the court.

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CASE NO. 2:10-cv-00879-GEB-DAD

**JOINT STIPULATION TO FILE
RESPONSIVE PLEADING BY
AUGUST 21, 2010;
[PROPOSED] ORDER**

PROCEDURAL HISTORY

The Complaint was filed on April 13, 2010.

The First Amended Complaint was filed on June 28, 2010.

4 On July 1, 2010, the First Amended Complaint and all related service documents were
5 emailed by Plaintiff's counsel to counsel for Baldwin Contracting Company, Inc., Mason
6 Richardson, and René Vercruyssen (BCCI). Counsel for BCCI is presently securing the
7 necessary waivers to represent Defendant BCJ Sand and Rock, Inc., and Defendant J. Brad
8 Slender (BCJ) in order to secure the ability to accept service on behalf of BCJ.

9 The parties acknowledge that formal service is a mere formality and acknowledge that
10 service of the amended complaint would occur no later than July 30, 2010, such that a responsive
11 pleading is due on or before August 21, 2010.

12 The parties will also be filing a joint Consent to Jurisdiction of United Magistrate Judge
13 and as a result, the Court's Order Setting Status (Pretrial Scheduling) Conference may be
14 changed.

15 In light of the foregoing, the parties request that the court allow a responsive pleading to
16 be filed no later than August 21, 2010.

17 We respectfully request that the Court grant this stipulation and sign the order below
18 reflecting this new date.

19 || SO STIPULATED.

21 || Dated: July 6, 2010

SCHARFF, BRADY & VINDING

By: s/Michael E. Vinding
Michael E. Vinding (SBN 178359)
Attorneys for Defendants
BALDWIN CONTRACTING COMPANY,
INC., MASON RICHARDSON and RENÉ
VERCRUYSSSEN

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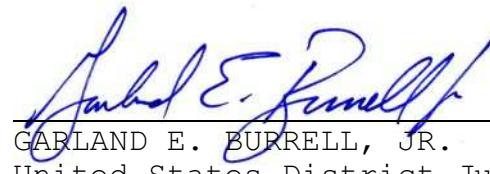
1 Dated: July 2, 2010

LAW OFFICES OF ANDREW L. PACKARD

3 By: s/Andrew L. Packard (as authorized on 7/2/10)
4 Andrew L. Packard (SBN 168690)
5 Attorneys for Plaintiff CALIFORNIA
6 SPORTFISHING PROTECTION ALLIANCE

7 **IT IS SO ORDERED.**

8 Date: 7/7/10

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10 GARLAND E. BURRELL, JR.
11 United States District Judge

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