

1 William S. Kronenberg - 133730  
 Steven W. Yuen - 230768  
 2 KRONENBERG LAW, P.C.  
 1999 Harrison Street, Suite 1450  
 3 Oakland, CA 94612-4729  
 Tel: (510) 254-6767  
 4 Fax: (510) 788-4092

5 Attorneys for Plaintiff in Interpleader/Defendant  
 MWE SERVICES, INC.  
 6 DBA MIDWEST DEMOLITION COMPANY

7  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

UNITED STATES DISTRICT COURT  
 EASTERN DISTRICT OF CALIFORNIA  
 SACRAMENTO DIVISION

MWE SERVICES, INC., AND  
 CHRISTOPHER J. MARTIN,

Plaintiffs,

v.

CALIFORNIA DEPARTMENT OF FORESTRY  
 AND FIRE PROTECTION; CALIFORNIA  
 DEPARTMENT OF CORRECTIONS;  
 CALIFORNIA HIGHWAY PATROL;  
 CAMPTONVILLE FIRE DEPARTMENT;  
 DOBBINS/OREGON HOUSE FIRE  
 PROTECTION DISTRICT; GRASS VALLEY  
 FIRE DEPARTMENT; LINDA FIRE  
 PROTECTION DISTRICT; NORTH SAN JUAN  
 FIRE PROTECTION DISTRICT; PACIFIC GAS  
 AND ELECTRIC COMPANY; PENN VALLEY  
 FIRE PROTECTION DISTRICT; U.S.  
 DEPARTMENT OF AGRICULTURE FOREST  
 SERVICE; U.S. GEOLOGICAL SURVEY; AND  
 DOES 1-2,500.

Defendants.

Case No.: 2:14-cv-00010-JAM-KJN

**STIPULATION TO EXTEND TIME TO  
 SUBMIT A JOINT STATUS REPORT, AND  
 ORDER**

AND ALL CONSOLIDATED CASES.

1 I. RECITALS

2 1. On February 27, 2013, plaintiffs MWE Services, Inc., and Christopher J. Martin filed  
3 their first amended complaint in interpleader (hereafter “the complaint”) in the Superior Court of  
4 California, County of Yuba bearing case number YCSCCVCV 12-0001124.

5 2. On June 24, 2013, the Superior Court of California, County of Yuba consolidated the  
6 interpleader complaint bearing case number YCSCCVCV 12-0001124 with the complaint bearing case  
7 number YCSCCVCV 12-0000768 filed by defendant in interpleader California Department of Forestry  
8 and Fire Protection.

9 3. On November 21, 2013, a request for dismissal without prejudice was filed with the  
10 Superior Court of California, County of Yuba dismissing defendants in interpleader California  
11 Department of Corrections; California Highway Patrol; Camptonville Fire Department;  
12 Dobbins/Oregon House Fire Protection District; Grass Valley Fire Department; Linda Fire Protection  
13 District; North San Juan Fire Protection District; Pacific Gas and Electric Company; and Penn Valley  
14 Fire Protection District. All remaining named defendants have been served.

15 4. On January 2, 2014, defendant in interpleader the United States of America timely filed  
16 a notice of removal of the complaint from the Superior Court of California, County of Yuba to the  
17 United States District Court, Eastern District of California.

18 5. By stipulation filed January 8, 2014 (ECF 4), and pursuant to Local Rule 144, the  
19 parties agreed to an extension of time through February 6, 2014, for any responsive pleading to be filed  
20 by any defendant served with the summons who had not answered the complaint in state court.

21 6. In accordance with court’s order requiring joint status report (ECF 2), the parties had a  
22 deadline of January 31, 2014, to confer as required by Fed. R. Civ. P. 26(f) and submit a joint status  
23 report to the court.

24 7. On January 24, 2014, all parties to this stipulation conferred, through their counsel of  
25 record, as required by Fed. R. Civ. P. 26(f).

26 8. On January 30, 2014, the court entered an order (ECF 8) extending the time for  
27 defendants to respond to the complaint in interpleader, and extending the time to submit the joint status  
28 report from January 31, 2014 to April 1, 2014 pursuant to the parties’ stipulation (ECF 7).



1 DATED: May 29, 2014

LEWIS BRISBOIS BISGAARD & SMITH LLP

2

3

/s/ David S. Worthington

4

By: \_\_\_\_\_

David S. Worthington

Talia L. Delanoy

5

Attorneys for Plaintiff in Interpleader/Defendant

6

CHRISTOPHER J. MARTIN

7 DATED: May 29, 2014

BENJAMIN B. WAGNER

8

United States Attorney

9

/s/ Glen F. Dorgan

10

By: \_\_\_\_\_

Glen F. Dorgan

Gregory Broderick

11

Attorneys for Defendant in Interpleader

12

UNITED STATES OF AMERICA

13 DATED: May 29, 2014

KAMALA D. HARRIS

14

California Attorney General

15

/s/ Stephen M. Lerner

16

By: \_\_\_\_\_

Stephen M. Lerner

Deputy Attorney General

17

Attorneys for Defendant in Interpleader/Plaintiff

18

CALIFORNIA DEPARTMENT OF FORESTRY

19

AND FIRE PROTECTION

20

**III. ORDER**

21 Based on the parties' stipulation, and for good cause appearing,

22 IT IS ORDERED the deadline for the parties to submit the joint status report to the court shall

23 be extended from June 1, 2014 to three weeks after the court issues its orders on defendants' motions.

24

25 DATE: May 29, 2014

/s/ John A. Mendez \_\_\_\_\_

26

Honorable John A. Mendez

27

United States District Court Judge

28