

1 STUART I. BLOCK (STATE BAR NO. 160688)  
 sblock@coxcastle.com  
 2 PERRY S. HUGHES (STATE BAR NO. 167784)  
 phughes@coxcastle.com  
 3 COX, CASTLE & NICHOLSON LLP  
 555 California Street, 10th Floor  
 4 San Francisco, CA 94104-1513  
 Telephone: (415) 392-4200, Facsimile: (415) 392-4250

5 Attorneys for Plaintiff  
 6 UNIVERSAL PARAGON CORPORATION and  
 SUNQUEST PROPERTIES, INC.

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

11 UNIVERSAL PARAGON CORPORATION, a  
 Delaware corporation; and SUNQUEST  
 12 PROPERTIES, INC., a California corporation,

13 Plaintiffs,

14 vs.

15 INGERSOLL-RAND COMPANY LIMITED, a  
 Bermuda corporation; INGERSOLL-RAND  
 16 CORPORATION, a New Jersey corporation;  
 17 SCHLAGE LOCK COMPANY, a California  
 corporation; and TOUCH-PLATE  
 18 INTERNATIONAL, INC., a California  
 corporation,

19 Defendants.

20  
 21 AND RELATED COUNTERCLAIM

Case No. CV-05-3100 TEH

**STIPULATION TO CONTINUE CASE  
 MANAGEMENT CONFERENCE;  
 [PROPOSED] ORDER**

Date: March 2, 2009  
 Time: 1:30 P.M.

Proposed Date: July 13, 2009  
 Time: 1:30 P.M.

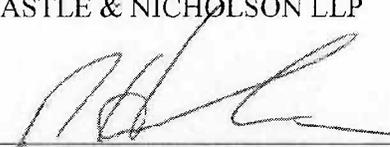
22  
 23 The parties, Plaintiffs Universal Paragon Corporation and Sunquest Properties, Inc.  
 24 (collectively "Plaintiffs") and Defendant Union Pacific Railroad Company, ("Union Pacific"), hereby  
 25 stipulate, subject to the Court's approval as provided below, to a continuance of the Case Management  
 26 Conference scheduled for March 2, 2009, so that they can continue in good faith to pursue settlement  
 27 discussions. Such discussions include the exchange of information from environmental professionals,  
 28

1 as well as the review of Plaintiffs' proposed Remedial Action Plan ("RAP"), which Plaintiffs contend  
2 will help to define the amount in Controversy. Plaintiffs do not expect that the RAP will be approved  
3 by the California Department of Toxic Substances Control until the end of April, 2009. Accordingly,  
4 the Parties stipulate to, and request that the Court, continue the Case Management Conference to July  
5 13, 2009, at 1:30 p.m., or such other date and time thereafter that is convenient to the Court.

6 Respectfully submitted,

7 DATED: February 25, 2009

COX, CASTLE & NICHOLSON LLP

8  
9 By: 

Perry S. Hughes, Attorney for  
Plaintiffs UNIVERSAL PARAGON CORP. and  
SUNQUEST PROPERTIES, INC.

10  
11 DATED: February 25, 2009

BARG COFFIN LEWIS & TRAPP LLP

12  
13 By: 

John F. Barg, Attorney for Counter-Defendant  
Union Pacific Railroad Company

14  
15  
16 IT IS ORDERED that the Case Management Conference scheduled on March 2, 2009, is hereby  
17 continued to July 13, 2009 at 1:30 ~~am~~ pm.

18 Dated: February 26, 2009

19 Honorable Thelton E. Henderson  
United States District Judge

