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9 Attorneys for Plaintiff  
 10 CRUMP INSURANCE SERVICES, INC.

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA

13 CRUMP INSURANCE SERVICES, INC.,

14 Plaintiff,

15 v.

16 MICHAEL P. MCGRATH, an individual, ALL  
 17 RISKS, LTD., a corporation, and Does 1  
 18 through 50, inclusive,

19 Defendants.

Case No. C-07-4636 MMC

**STIPULATION TO MODIFY  
 BRIEFING SCHEDULE AND  
 CHANGE HEARING DATE ON  
 DEFENDANTS' MOTION FOR  
 SUMMARY JUDGMENT AND  
 [PROPOSED] ORDER**

Date: October 10, 2008  
 Time: 9:00 a.m.  
 Courtroom: 7  
 Judge: Maxine M. Chesney

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1 Magistrate Judge Larson previously ordered Defendants All Risks, Ltd. and Michael  
2 McGrath to produce documents responsive to requests propounded by Plaintiff Crump Insurance  
3 Services, Inc. by September 8, 2008. Defendants produced close to 2000 pages at that time.  
4 However, the retrieval of archived tapes and the restoration of those tapes delayed Defendants'  
5 ability to review additional electronic documents that may have been responsive. As a result,  
6 Defendants produced an additional 1000 pages on September 15, 2008 and may have a final set of  
7 documents ready to be produced by September 17, 2008. Accordingly, it is appropriate to allow  
8 Plaintiff additional time to review those documents prior to completing and filing its Opposition  
9 to Defendants' Motion for Summary Judgment. That Opposition is currently due on September  
10 19, 2008. The parties thus have good cause to request that this Court extend the time for Plaintiff  
11 to file its Opposition, which also causes a continuance in the hearing on Defendants' Motion for  
12 Summary Judgment.

13 Defendants All Risks, Ltd. and Michael McGrath and Plaintiff Crump Insurance Services,  
14 Inc. hereby stipulate to modify the briefing schedule for Defendants' Motion for Summary  
15 Judgment and the hearing date as follows:

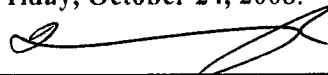
16 Plaintiff's Opposition due **Friday, October 3, 2008.**

17 Defendants' Reply due **Friday, October 10, 2008.**

18 Hearing moved to 9:00 a.m. on **Friday, October 24, 2008.**

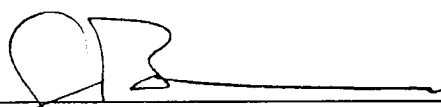
19 Dated: \_\_\_\_\_

9/15/08

  
\_\_\_\_\_  
Mark S. Askanas, Esq.  
Dylan B. Carp, Esq.  
JACKSON LEWIS LLP  
Counsel for Plaintiff  
CRUMP INSURANCE SERVICES, INC.

24 Dated: \_\_\_\_\_

9-15-08

  
\_\_\_\_\_  
John Baum, Esq.  
CURIALE DELLAVERSON  
HIRSCHFELD & KRAEMER, LLP  
Counsel for Defendants  
MICHAEL P. MCGRATH and ALL RISKS, LTD.

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~~[PROPOSED]~~ ORDER


In consideration of the above, IT IS SO ORDERED that the briefing schedule is modified and hearing date is moved on Defendants' Motion for Summary Judgment as follows:

Plaintiff's Opposition due **Friday, October 3, 2008.**

Defendants' Reply due **Friday, October 10, 2008.**

Hearing moved to 9:00 a.m. on **Friday, October 24, 2008.**

Dated: September 16, 2008

  
MAXINE M. CHESNEY  
Judge, United States District Court  
Northern District of California