1 2 3 4 5 6 7 8	Erich P. Wise/State Bar No. 63219 Aleksandrs E. Drumalds/State Bar No. 2 FLYNN, DELICH & WISE LLP One World Trade Center, Suite 1800 Long Beach, California 90831-1800 Telephone: (562) 435-2626 Facsimile: (562) 437-7555 James B. Nebel/State Bar No. 69626 Conte C. Cicala/State Bar No. 173554 FLYNN, DELICH & WISE LLP One California Street, Suite 350 San Francisco, California Telephone: (415) 693-5566 Facsimile: (415) 693-0410	237101
9	Attorneys for Defendant HANJIN SHIPPING CO., LTD.	
11 12 13	UNITED STATES DIS	
14 15 16 17 18 19 20 21 22 23 24 25	Chelsea, LLC, Mark Russo, and Allen Loretz, individually and on behalf of all others similarly situated, Plaintiffs, vs. Regal Stone, Ltd., Hanjin Shipping Co., Ltd., Synergy Maritime, Ltd., Fleet Management, Ltd., and John Cota, <i>In Personam</i> ; M/V Cosco Busan, their engine, tackle, equipment, appurtenances, freights, and cargo, <i>In Rem</i> ,) CASE NO.: CV-07-5800 SC)) STIPULATION OF PLAINTIFFS AND DEFENDANT HANJIN SHIPPING CO., LTD. TO FURTHER EXTEND THE TIME FOR FILING AND SERVICE OF A RESPONSE TO PLAINTFFS' VERIFIED SECOND AMENDED CLASS ACTION COMPLAINT; ORDER THEREON) [Civil Local Rule 6-1(b)]
26	Defendants.)
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ATTORNEYS AT LAW One World Trade Center, Suite 1800 Long Beach, California 90831-1800 (562) 435-2626

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TO THE COURT AND ALL COUNSEL OF RECORD:

IT IS HEREBY STIPULATED by and between plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ ("Plaintiffs") and defendant HANJIN SHIPPING CO., LTD, ("Hanjin"), through their respective counsel of record, that the time for Hanjin to file and serve a response to Plaintiffs' Verified Second Amended Class Action Complaint is further extended by an additional fourteen (14) days. Defendant Hanjin will file and serve its response to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, September 19, 2008. The Court has approved two previous requests by Plaintiffs and Hanjin to extend the time for Hanjin to respond to Plaintiffs' Verified Second Amended Class Action Complaint.

This stipulation for a further extension of time is not entered into for purposes of delay, but to permit defendant Hanjin to continue its investigation, to address the new allegations contained in Plaintiffs' Verified Second Amended Class Action Complaint, and to allow defendant Hanjin to formulate a proper response.

IT IS SO STIPULATED AND AGREED.

18	Dated: September 5, 2008	AUDET & PARTNERS, LLP
19		
20		By: /s/ William M. Audet (as authorized on 9/5/08) William M. Audet
21		Attorney for Plaintiff
22		CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ
23		
24	Dated: September 5, 2008	FLYNN, DELICH & WISE LLP
25		By: /s/ Erich P. Wise
26		Erich P. Wise Attorney for Defendant
27		HANJIN SHIPPING CO., LTD
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FLYNN, DELICH & WISE LLP ATTORNEYS AT LAW One World Trade Center, Suite 1800 Long Beech, California 90831-1800 (562) 435-2626

ORDER

Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the time for defendant HANJIN SHIPPING CO., LTD to file and serve a response to the Verified Second Amended Class Action Complaint of plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ is further extended by an additional fourteen days (14) days. Defendant Hanjin is ordered to file and serve its response to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, September 19, 2008.

PURSUANT TO STIPU	LATION, IT IS SOMERIED
0/9/09	

Dated: 9/8/08

HON. SAI IT IS SO ORDERED UNITED THUDGE

Judge Samuel Conti

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