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10 UNITED STATES DISTRICT COURT FOR
 11 THE NORTHERN DISTRICT OF CALIFORNIA

14 Chelsea, LLC, Mark Russo, and Allen) CASE NO.: CV-07-5800 SC
 15 Loretz, individually and on behalf of)
 16 all others similarly situated,) STIPULATION OF PLAINTIFFS
) AND DEFENDANT HANJIN
 17 Plaintiffs,) SHIPPING CO., LTD. TO
) FURTHER EXTEND THE TIME
 18 vs.) FOR FILING AND SERVICE OF A
 19) RESPONSE TO PLAINTFFS'
) VERIFIED SECOND AMENDED
 20 Regal Stone, Ltd., Hanjin Shipping) CLASS ACTION COMPLAINT;
 21 Co., Ltd., Synergy Maritime, Ltd.,) ORDER THEREON
 22 Fleet Management, Ltd., and John)
 23 Cota, *In Personam*; M/V Cosco) [Civil Local Rule 6-1(b)]
 24 Busan, their engine, tackle,)
 equipment, appurtenances, freights,)
 and cargo, *In Rem*,)
 25)
 26 Defendants.)

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

1 **TO THE COURT AND ALL COUNSEL OF RECORD:**

2 **IT IS HEREBY STIPULATED** by and between plaintiffs CHELSEA,
3 LLC, MARK RUSSO, and ALLEN LORETZ (“Plaintiffs”) and defendant
4 HANJIN SHIPPING CO., LTD, (“Hanjin”), through their respective counsel of
5 record, that the time for Hanjin to file and serve a response to Plaintiffs’ Verified
6 Second Amended Class Action Complaint is further extended by an additional
7 seven (7) days. Defendant Hanjin will file and serve its response to Plaintiffs’
8 Verified Second Amended Class Action Complaint no later than Friday,
9 September 26, 2008. The Court has approved previous requests by Plaintiffs and
10 Hanjin to extend the time for Hanjin to respond to Plaintiffs’ Verified Second
11 Amended Class Action Complaint.

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

17 **IT IS SO STIPULATED AND AGREED.**

18 Dated: September 18, 2008 AUDET & PARTNERS, LLP

19
20 By: /s/ William M. Audet (as authorized on 9/18/08)
William M. Audet
21 Attorney for Plaintiff
22 CHELSEA, LLC, MARK RUSSO, and
ALLEN LORETZ

23 Dated: September 18, 2008 FLYNN, DELICH & WISE LLP

24
25 By: /s/ Erich P. Wise
26 Erich P. Wise
27 Attorney for Defendant
HANJIN SHIPPING CO., LTD

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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 seven days (7) days. Defendant Hanjin is ordered to file and serve its response to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, September 26, 2008.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 19, 2008

HON. SA _____
UNITED STATES DISTRICT COURT OF CALIFORNIA, NORTHERN DISTRICT OF CALIFORNIA
IT IS SO ORDERED
Samuel Conti
Judge Samuel Conti
DISTRICT JUDGE