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11 UNITED STATES DISTRICT COURT FOR
 12
 13 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
 17 Plaintiffs,) AND DEFENDANT HANJIN
 18) SHIPPING CO., LTD. TO
 19 vs.) FURTHER EXTEND THE TIME
 20) FOR FILING AND SERVICE OF A
 21) RESPONSE TO PLAINTFFS'
 22 Regal Stone, Ltd., Hanjin Shipping) VERIFIED SECOND AMENDED
 23 Co., Ltd., Synergy Maritime, Ltd.,) CLASS ACTION COMPLAINT;
 24 Fleet Management, Ltd., and John) ORDER THEREON
 25 Cota, *In Personam*; M/V Cosco) [Civil Local Rule 6-1(b)]
 26 Busan, their engine, tackle,)
 27 equipment, appurtenances, freights,)
 28 and cargo, *In Rem*,)
 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, October
9 3, 2008. The Court has approved previous requests by Plaintiffs and Hanjin to
10 extend the time for Hanjin to respond to Plaintiffs’ Verified Second Amended
11 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 26, 2008 AUDET & PARTNERS, LLP

19
20 By: /s/ William M. Audet (as authorized on 9/26/08)
21 William M. Audet
22 Attorney for Plaintiff
23 CHELSEA, LLC, MARK RUSSO, and
24 ALLEN LORETZ

25 Dated: September 26, 2008 FLYNN, DELICH & WISE LLP

26 By: /s/ Erich P. Wise
27 Erich P. Wise
28 Attorney for Defendant
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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, October 3, 2008.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 29, 2008

HON. SAMUEL CONTI
UNITED STATES DISTRICT JUDGE

