1 Gillian M. Ross, Bar No. 127116 Eugene M. Pak, Bar No. 168699 2 Gregory K. Jung, Bar No. 203350 WENDEL, ROSEN, BLACK & DEAN LLP 3 1111 Broadway, 24th Floor Oakland, California 94607 4 Telephone: (510) 834-6600 Fax: (510) 834-1928 Email: epak@wendel.com 5 6 Attorneys for Defendants Mohammed Karwash and Hassan Ibrahim 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 12 BELCAN ENGINEERS, Case No. 3:09-CV-02891 MMC 13 Plaintiff, STIPULATED MOTION TO AMEND CASE MANAGEMENT CONFERENCE **ORDER SCHEDULE** 14 VS. [L.R. 16-2] 15 MOHAMMED KARWASH, TOM LINN dba TOM LINN DRAFTING & DESIGN, 16 JOSE JIMENEZ dba J&M DESIGN, WILEY R. CHITWOOD, HASSAN C. 17 IBRAHIM, and SOUTHWAY ENGINEERING & CONSTRUCTION, 18 Defendants. 19 20 21 Pursuant to Local Rule 16-2(d), Plaintiff Belcan Engineers ("Plaintiff") and Defendants 22 Mohammed Karwash and Hassan Ibrahim ("Defendants") (collectively referred to as the 23 "Parties") hereby stipulate and jointly request that the deadlines in this action be extended. 24 Good cause exists for such extension as the Parties have reached a settlement that they are 25 currently memorializing in writing which requires performance of certain settlement terms over a 26 period of approximately ten (10) months in exchange for a dismissal of the entire action. 27

The other defendants in this action have not appeared and have defaulted.

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Accordingly, the Parties respectfully request that the Court's Scheduling Order of April 27, 2012 be amended to allow for full performance of the settlement terms prior to dismissal of this action. The Parties request that the current deadlines in this action be re-set to the following year as follows:

Event	Current Deadline	Proposed Deadline
Fact Discovery Cut-Off	July 27, 2012	July 26, 2013
Expert Disclosure	September 1, 2012	September 3, 2013
Rebuttal Expert Disclosure	September 20, 2012	September 24, 2013
Joint Statement	October 5, 2012	October 7, 2013
Further Status Conference	October 12, 2012 at 10:30 a.m.	October 11, 2013 at 10:30 a.m.
Expert Discovery Cutoff	October 19, 2012	October 22, 2013
Dispositive Motion Deadline	November 2, 2012	November 4, 2013
Meet and Confer	December 17, 2012	December 16, 2013
Pretrial Conference	January 22, 2013 at 3:00 p.m.	January 21, 2013 at 3:00 p.m.
Trial	February 4, 2013 at 9 a.m.	February 4, 2013 at 9 a.m.
11161	(3 days)	(3 days)

IT IS SO STIPULATED:

Dated: June 1, 2012	WENDEL, ROSEN, BLACK & DEAN LLP

By: /s/ Eugene M. Pak
Eugene M. Pak
Attorneys for Defendants
Mohammed Karwash and Hassan Ibrahim

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Lintad: lung L /III /	
Dated: June 1, 2012	THE MORALES LAW FIRM

25	By: /s/ David P. Morales
26	David P. Morales Attorneys for Plaintiff
27	Belcan Engineers

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Wendel, Rosen, Black & Dean LLP 1111 Broadway, 24th Floor Oakland, CA 94 607 PURSUANT TO STIPULATION, IT IS SO ORDERED, with the exception that the pretrial conference is continued to January 21, 2014 and the trial is continued to February 3, 2014.

Dated: June <u>6</u>, 2012

By: Makine M. Chesney
United States District Court Judge

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