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4 Attorneys for Third Party Defendant
 5 HORIZON LINES LLC

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 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 THE NORTHERN ASSURANCE
 COMPANY OF AMERICA,

12 Plaintiff,

13 vs.

14 UNICOLD CORPORATION

15 Defendant.

CASE NO.: CV 093807 MHP

**STIPULATION AND PROPOSED
 ORDER POSTPONING THE
 MEDIATION COMPLETION DATE**

16 UNICOLD CORPORATION,

17 Third-Party Plaintiff,

18 vs.

19 HORIZON LINES LLC

20 Third-Party Defendant.

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 23 WHEREAS Horizon Lines believes that any claim against it is time barred and plans to
 24 file a motion for summary judgment on these grounds,

25 WHEREAS the parties agree that the time bar issue should be resolved before proceeding
 26 with the mediation,

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1 IT IS HEREBY STIPULATED and agreed that the date by which to complete mediation
2 shall be extended from August 20, 2010 to October 22, 2010 and that the Case Management
3 Conference will remain set for September 13, 2010.

4
5 DATED: July 21, 2010 EMARD DANOFF PORT TAMULSKI & PAETZOLD LLP
6 By /s/ Talcott N. Bates
7 Talcott N. Bates
8 Attorney for Third-Party Defendant
9 HORIZON LINES, LLC

10 DATED: July 21, 2010 By /s/ Edward M. Bull III
11 Edward M. Bull III
12 Attorney for Third-Party Plaintiff
13 UNICOLD CORPORATION

14 DATED: July 21, 2010 By /s/ Mitchell Griffin
15 Mitchell Griffin
16 Attorneys for Plaintiff
17 THE NORTHERN ASSURANCE COMPANY OF
18 AMERICA

19 **CERTIFICATE OF SIGNATURE**

20 I, Talcott N. Bates, attest that the content of this document is acceptable to Edward M.
21 Bull, III and Mitchell Griffin, and that they authorized me to sign the document on their behalf.

22 By /s/ Talcott N. Bates
23 Talcott N. Bates

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ORDER

Good cause appearing therefore, IT IS HEREBY ORDERED THAT:

- 1. The date to complete mediation in this matter has been extended to October 22, 2010;
- 2. The Case Management Conference will remain set for September 13, 2010.

DATED: July 22, 2010

By _____

