

E-Filed 11/5/10

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 9 COSCO CONTAINER LINES COMPANY LIMITED

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IN THE UNITED STATES DISTRICT COURT
 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 COSCO CONTAINER LINES COMPANY)
 12 LIMITED,)
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Plaintiff,

vs.

HECNY SHIPPING LIMITED, HECNY
 TRANSPORTATION INC., EXEL
 INTERMODAL, and DOES 1 THROUGH 10,
 Defendants.

Case No.: CV 09-04173 RS

**STIPULATION AND ~~PROPOSED ORDER~~
 TO CONTINUE MEDIATION AND
 MEDIATION DEADLINE**

Complaint filed: 09/09/09
 CMC: 03/24/11
 Pre-trial conf: 07/07/11
 Trial: 07/18/11

Hon. Richard Seeborg
 Courtroom 3, 17th Floor

19 HECNY SHIPPING LIMITED, HECNY
 20 TRANSPORTATION INC.,
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Third-Party Plaintiffs,

vs.

EXEL INTERMODAL, INC.; GLOBAL
 CARGO CONNECTION; WORLD WAY
 INTERNATIONAL; ROYAL WHITE
 CEMENT; QINGDAO JUNYANG INT'L
 LOGISTICS CO.; and ROES 1 through 10,
 inclusive,
 Third-Party Defendants.

STIPULATION RE MEDIATION
 Case No. CV 09-04173 RS

FLYNN, DELICH & WISE LLP
 ATTORNEYS AT LAW
 343 SANSOME STREET, SUITE 540
 SAN FRANCISCO, CALIFORNIA 94104
 (415) 693-5566

1 All appearing parties to this action together request that this Court continue the deadline to
2 conduct mediation for 30 days, and mediation from its current date of November 10th to a date
3 within that extended deadline. This stipulation has been made because the parties have been
4 engaging in pre-mediation settlement discussions and it is their collective view that such a
5 continuance will increase the chance of a productive mediation. The reasons for this include a
6 desire by the parties to conduct one or two depositions and obtain responses to outstanding
7 discovery, and continuing efforts by the parties to continue to informally educate one another
8 regarding their respective positions. COSCO's willingness to agree to this continuance is
9 expressly conditioned that no depositions of COSCO take place in the interim.
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12 Dated: November 4, 2010

LAW OFFICES OF ALEXANDER
MOGHADDAM

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15 By:  *per email authority*

Alex Moghaddam

Attorneys for Defendants &
Third Party Plaintiffs
HECNY SHIPPING LIMITED &
HECNY TRANSPORTATION INC.

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20 Dated: November 4, 2010

FLYNN, DELICH & WISE LLP

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22 By: 

Conte C. Cicala

Attorneys for Plaintiff, COSCO
CONTAINER LINES COMPANY LIMITED

23
24
25 Dated: November 4, 2010

STRASSBURG, GILMORE & WEI, LLP

26
27 By:  *per email authority*

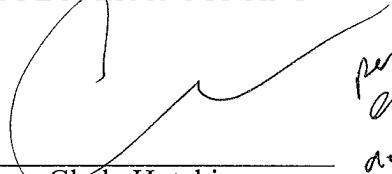
William Rivers Gilmore

Attorneys for Defendants Global Cargo
Connection

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Dated: November 4, 2010

LOMBARDI LOPER & CONANT

By:  *per personal authority*
Clyde Hutchinson
Attorneys for Defendants World Way
International.

PROPOSED ORDER

Pursuant to Stipulation and good cause having been shown,

IT IS SO ORDERED.

Date: 11/5/10


UNITED STATES DISTRICT JUDGE

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