

1 Wayne W. Call, Bar No. 56676
 Kent R. Christensen, Bar No. 253815
 2 CALL & JENSEN
 A Professional Corporation
 3 610 Newport Center Drive, Suite 700
 Newport Beach, CA 92660
 4 Telephone: (949) 717-3000; Fax: (949) 717-3100
wcall@calljensen.com
kchristensen@calljensen.com

6 Scott T. Evans, Utah Bar No. 6218
 CHRISTENSEN & JENSEN, P.C.
 7 15 West South Temple, Suite 800
 Salt Lake City, UT 84101
 8 Telephone: (801) 323-5000; Fax: (801) 323-9037
scott.evans@chrisjen.com
 9 *PRO HAC VICE*

10 Attorneys for Defendant, Counterclaimant, and Third-Party
 Claimant Pacific International Vegetable Marketing, Inc.

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

14 NATIONAL SURETY CORPORATION, an
 Illinois corporation,

15 Plaintiff,

16 vs.

17 PACIFIC INTERNATIONAL VEGETABLE
 18 MARKETING, INC., a California corporation;
 and DOES 1 to 20,

19 Defendants.

21 PACIFIC INTERNATIONAL VEGETABLE
 MARKETING, INC., a California corporation,

22 Counterclaimant,

23 vs.

24 NATIONAL SURETY CORPORATION, an
 25 Illinois corporation,

26 Counterdefendant.

Case No. 3:09-CV-04898-EMC

Case Assigned to:
 Magistrate Judge Edward M. Chen

**STIPULATION TO EXTEND DATES IN
 INITIAL CASE MANAGEMENT
 CONFERENCE AND ADR DEADLINES
 ORDER**

Complaint Filed: September 18, 2009
 Trial Date: None Set

1
2 PACIFIC INTERNATIONAL VEGETABLE
3 MARKTING, INC., a California corporation,

4 Third-Party Claimant,

5 vs.

6 TWIW INSURANCE SERVICES, LLC, a
7 California limited liability company,

8 Third-Party Defendant.

9 Plaintiff and Counter-Defendant NATIONAL SURETY CORPORATION; Defendant and
10 Counter-Claimant PIM MARKETING, INC., and TWIW INSURANCE SERVICES, LLC, by and
11 through their respective counsel, stipulate and agree that that the current ADR deadlines may be
12 extended as follows:

13 New Date	14 Event	15 Governing Rule
16 02/10/2010	17 Last day to meet & confer re: Initial Disclosures, 18 early settlement; ADR process selection, and 19 discovery plan;	20 FRDivP 26(F) & ADR L.R.3-5
	21 File ADR Certification signed by Parties and 22 Counsel;	23 Civil L.R. 16-8(b) & ADR 24 L.R.3-5(b)
	25 File either Stipulation to ADR Process or Notice of 26 Need for ADR Phone Conference;	27 Civil L.R. 16-8© & ADR L.R. 28 3-5(b) & (c)
29 02/27/2010	30 Last Day to file Rule 26(f) report, complete initial 31 disclosures or state objection in Rule 26(f) Report 32 and file Case Management Statement per Standing 33 Order re: Contents of Joint Case Management 34 Statement;	35 Civil L.R. 16-9
36 02/24/2010		
37 03/3/2010	38 INITIAL CASE MANAGEMENT CONFERENCE 39 in Courtroom C, 15 th Floor SF at 1:30 p.m. 3:00 p.m.	40 Civil L.R. 16-10

41 The reason for said extension is that TWIW's answer is not due until January 25, 2010, and
42 counsel for TWIW has therefore not yet entered their appearance for TWIW. Additionally, counsel
43 for Plaintiff and Counter-Defendant is being substituted by Michael C. Cooper of Carlson, Calladine &
44 Peterson, although said substitution has not yet taken place. Counsel of record and counsel of
45 interested parties have agreed that it would be in the interest of judicial economy to delay these dates

1 until TWIW's counsel has entered their appearance and answered the Complaint on behalf of their
2 clients, and to allow NSC's substitution of counsel to take place.

3 IT IS SO STIPULATED.

4 DATED this 21 day of January, 2010.

5 HINSHAW & CULBERTSON LLP

6 
7 Christopher J. Borders
8 *Attorneys for Plaintiff and Counter-Defendant*
9 *National Surety Corporation*

9 DATED this ____ day of January, 2010.

10 CARLSON, CALLADINE & PETERSON, LLP

11
12

Michael C. Cooper
13 *An Interested Party on behalf of Plaintiff and*
14 *Counter-Defendant National Surety Corporation*

14 DATED this ____ day of January, 2010.

15 CHRISTENSEN & JENSEN, P.C.


16
17

Scott T. Evans, appearing pro hac vice

18 CALL, JENSEN & FERRELL
19 Wayne W. Call
20 Kent R. Christensen
21 *Attorneys for Defendant, Counter-Claimant and*
22 *Third-Party Plaintiff Pacific International*
23 *Vegetable Marketing, Inc.*

23 DATED this 21 day of January, 2010.

24 MILLER, LP

25 
26

Randall Miller
27 Thomas Burg
28 *An interested Party on behalf of Third-Party*
29 *Defendant TWIW Insurance Services, LLC*

1 until TWIW's counsel has entered their appearance and answered the Complaint on behalf of their
2 clients, and to allow NSC's substitution of counsel to take place.

3 IT IS SO STIPULATED.

4 DATED this _____ day of January, 2010.

5 HINSHAW & CULBERTSON LLP

6
7 _____
8 Christopher J. Borders
9 *Attorneys for Plaintiff and Counter-Defendant*
10 *National Surety Corporation*

11 DATED this 21 day of January, 2010.

12 CARLSON, CALLADINE & PETERSON, LLP

13 _____
14 Michael C. Cooper
15 *An Interested Party on behalf of Plaintiff and*
16 *Counter-Defendant National Surety Corporation*

17 DATED this _____ day of January, 2010.

18 CHRISTENSEN & JENSEN, P.C.

19 _____
20 Scott T. Evans, appearing pro hac vice

21 CALL, JENSEN & FERRELL
22 Wayne W. Call
23 Kent R. Christensen
24 *Attorneys for Defendant, Counter-Claimant and*
25 *Third-Party Plaintiff Pacific International*
26 *Vegetable Marketing, Inc.*

27 DATED this _____ day of January, 2010.

MILLER, LP

Randall Miller
Thomas Burg
An interested Party on behalf of Third-Party
Defendant TWIW Insurance Services, LLC

1 until TWIW's counsel has entered their appearance and answered the Complaint on behalf of their
2 clients, and to allow NSC's substitution of counsel to take place.

3 IT IS SO STIPULATED.

4 DATED this ____ day of January, 2010.

5 HINSHAW & CULBERTSON LLP

6
7 _____
8 Christopher J. Borders
9 Attorneys for Plaintiff and Counter-Defendant
10 National Surety Corporation

11 DATED this ____ day of January, 2010.

12 CARLSON, CALLADINE & PETERSON, LLP

13 _____
14 Michael C. Cooper
15 An Interested Party on behalf of Plaintiff and
16 Counter-Defendant National Surety Corporation

17 DATED this 22 day of January, 2010.

18 CHRISTENSEN & JENSEN, P.C.

19 _____
20 
21 Scott T. Evans, appearing pro hac vice

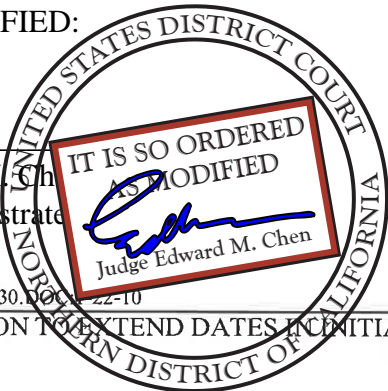
22 CALL & JENSEN, PC
23 Wayne W. Call
24 Kent R. Christensen
25 Attorneys for Defendant, Counter-Claimant and
26 Third-Party Plaintiff Pacific International
27 Vegetable Marketing, Inc.

28 DATED this ____ day of January, 2010.

29 MILLER, LP

30 IT IS SO ORDERED
31 AS MODIFIED:

32 _____
33 Edward M. Chen
34 U.S. Magistrate



35 _____
36 Randall Miller
37 Thomas Burg
38 An interested Party on behalf of Third-Party
39 Defendant TWIW Insurance Services, LLC