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 6 NATIONAL SURETY CORPORATION

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

11 NATIONAL SURETY CORPORATION,)
 12 Plaintiff,)
 13 vs.)
 14 PACIFIC INTERNATIONAL VEGETABLE)
 15 MARKETING, INC., a California)
 corporation; and DOES 1 to 20,)
 16 Defendants.)

Case No.: 3:09-CV-04898-EMC
**STIPULATION AND [PROPOSED]
 ORDER EXTENDING THE COURT
 ORDER FOR COMPLETION OF ADR**

Complaint Filed: September 18, 2009
 Trial Date: January 30, 2012

17 PACIFIC INTERNATIONAL VEGETABLE)
 18 MARKETING, INC., a California)
 19 corporation,)
 20 Counter-claimant,)
 21 vs.)
 22 NATIONAL SURETY CORPORATION, an)
 23 Illinois corporation,)
 24 Counter-defendant.)

25 PACIFIC INTERNATIONAL VEGETABLE)
 26 MARKETING, INC., a California)
 27 corporation,)
 28 Cross-Complainant,)
 vs.)

CARLSON CALLADINE & PETERSON, LLP
 353 SACRAMENTO STREET
 16TH FLOOR
 SAN FRANCISCO, CA 94111

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1 TWIW INSURANCE SERVICES, LLC, a)
California corporation,)
2)
Cross-Defendant.)
3)
_____)
4 TWIW INSURANCE SERVICES, LLC, a)
California limited liability company,)
5)
Cross-Complainant,)
6)
vs.)
7)
NATIONAL SURETY CORPORATION, an)
8 Illinois corporation,)
Cross-Defendant.)
9)
_____)
10)

11 Plaintiff and Cross-Defendant NATIONAL SURETY CORPORATION, Defendant and
12 Cross-Complainant PIM MARKETING, INC., and Cross-Complainant and Cross-Defendant
13 TWIW INSURANCE SERVICES, LLC, by and through their respective counsel, stipulate and
14 agree that the current deadline for the completion of ADR (mediation through JAMS) may be
15 extended from August 20, 2010 to August 27, 2010.

16 The reason for the one-week extension is that the parties agreed upon JAMS mediator,
17 Judge James Warren (Retired), and had scheduled the mediation for August 16, 2010.
18 Unfortunately, the parties were informed by Judge Warren’s assistant on July 13, 2010 that a
19 conflict had arisen in Judge Warren’s calendar and the mediation had to be rescheduled. The
20 parties reserved the next available mediation date on Judge Warren’s calendar, August 23, 2010,
21 pending the Court’s execution of this Order. The brief extension for the completion of ADR in
22 this matter should not impact the remaining case management schedule. An updated joint status
23 conference statement is due on September 1, 2010, and the status conference is scheduled for
24 September 8, 2010. The trial is not scheduled until early 2012.

25 IT IS SO STIPULATED.
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DATED: July ___, 2010

CARLSON, CALLADINE & PETERSON LLP

/s/ Michael C. Cooper
Michael C. Cooper
Attorneys for Plaintiff and Cross-Defendant
NATIONAL SURETY CORPORATION

DATED: July ___, 2010

MILLER LLP

/s/ Randall Miller
Randall Miller
Courtney Henning
Attorneys for Cross-Defendant and Cross-Complainant
TWIW INSURANCE SERVICES, LLC

DATED: July ___, 2010

CHRISTENSEN & JENSEN, P.C.

/s/ Scott T. Evans
Scott T. Evans, appearing pro hac vice
Attorneys for Defendant and Cross-Complainant
PACIFIC INTERNATIONAL VEGETABLE
MARKETING, INC.

~~[PROPOSED]~~ ORDER

Pursuant to the Stipulation above, the deadline for completion of ADR is extended to August 23, 2010.

IT IS SO ORDERED.

DATED: July ²¹_____, 2010

