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5 Plaintiff Pro-Se

DEC 28 P. 3:27  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA

9  
10 LAKHBIR BHAMBRA, )

11 Plaintiff, )

12 v. )

13 AMERICAN PRESIDENT LINES, LTD. )  
14 and URBAN OUTFITTERS Inc. and DOES )  
One through Ten, inclusive, )

15 Defendants. )  

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Case No. CV 09 5508 SI

STIPULATION AND  
[PROPOSED] ORDER  
EXTENDING TIME FOR  
DEFENDANT AMERICAN  
PRESIDENT LINES, LTD. TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT

16  
17 This Stipulation is entered into by and among plaintiff LAKHBIR  
18 BHAMBRA and Defendant AMERICAN PRESIDENT LINES, LTD. through their  
19 pro se counsel and appointed counsel, respectively.

20 WHEREAS Plaintiff served the Summons and Complaint on the above-named  
21 Defendant, American President Lines, Ltd. by mailing same to Defendant on November  
22 23, 2009, via the US Mail;

23 WHEREAS AMERICAN PRESIDENT LINES, LTD.'s response is due on or  
24 before December 23, 2009, absent an extension of time;

25 WHEREAS AMERICAN PRESIDENT LINES, LTD. having just appointed  
26 counsel, requested through its counsel an extension of time to respond to Plaintiff's  
27 Complaint on December 9, 2009;

28 WHEREAS, the parties desire to conduct investigation and settlement discussions

1 in the interim, which may obviate the need for further litigation.

2 LAKHBIR BHAMBRA and AMERICAN PRESIDENT LINES, LTD. stipulate  
3 and agree as follows:

4 The time for AMERICAN PRESIDENT LINES, LTD. to respond to Plaintiff's  
5 Complaint shall be extended to January 15, 2010.

6  
7 Dated: December 10, 2009

In Pro-per

8  
9  
10 By: 

~~Lakhbir Bhambra~~

11  
12  
13 Dated: December 10, 2009

LUCAS VALLEY LAW

14  
15  
16 By: 

Mark K. de Langis

Attorneys for American President Lines, Ltd.

17  
18  
19  
20  
21 **[PROPOSED] ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23  
24 DATED: \_\_\_\_\_



25 United States District Judge

PROOF OF SERVICE

I am a citizen of the United States, over 18 years of age, not a party to this action and employed in the County of Alameda, California, at 2498 W14th St. Bldg. 808, Oakland, California. I am readily familiar with the practice of this office for collection and processing of correspondence for mailing with the United States Postal Service and correspondence is deposited with the United States Postal Service that same day in the ordinary course of business.

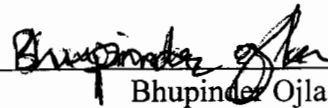
Today I served the attached:

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR  
DEFENDANT AMERICAN PRESIDENT LINES, LTD. TO RESPOND  
TO PLAINTIFF'S COMPLAINT**

by causing a true and correct copy of the above to be placed in the United States Mail at San Pablo, California in sealed envelope(s) with postage prepaid, addressed as follows:

Mark K. de Langis, Esq.  
Lucas Valley Law  
2110 Elderberry Lane  
San Rafael, CA 94903

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on December 10, 2009.

  
Bhupinder Ojla