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Attorneys for Defendant
BAYSIDE BOATWORKS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(E-Filing)

ROBERT C. KEMPER,

Plaintiff,

v.

BAYSIDE BOATWORKS, INC.,

Defendant.

) Case No.: C 10-0242MEJ
)
) **STIPULATION AND [PROPOSED]**
) **ORDER TO CONTINUE THE CASE**
) **MANAGEMENT CONFERENCE**
) **SCHEDULED FOR JUNE 17, 2010**
)
)
)
)
)

STIPULATION AND REQUEST

The parties to this action, by and through their attorneys of record, hereby respectfully request and submit that *good cause* exists to continue the Case Management Conference currently scheduled for June 17, 2010, by approximately sixty-days to a date convenient to the Court’s calendar the week of August 16, 2010, in the interests of judicial economy.

The parties to this action, their counsel, counsel for Defendant in a related California State Workers’ Compensation Action, counsel for Plaintiff in a related U.S. Longshore and Harborworkers’ Compensation Action, and perhaps one additional entity (whom is not yet a party to any of the actions, but may become one) are attempting to schedule a mediation for all parties and counsel to participate in over the next forty-five days. At the anticipated mediation, the parties will attempt to reach a global settlement of all actions, including the

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1 one currently pending before this Court. If the parties are successful a global settlement
2 would result in a dismissal of this action with no further proceedings in this Court.

3 The parties therefore submit that *good cause* exists to continue the Case
4 Management Conference scheduled for June 17, 2010 for approximately sixty-days to allow
5 the parties to schedule and participate in a mediation in attempt to reach a resolution of this
6 action and the companion workers' compensation cases.

9 Dated: June 8, 2010

BRODSKY MICKLOW BULL & WEISS LLP
Attorneys for Plaintiff ROBERT KEMPER

11 By: /S/ Edward M. Bull III
12 Edward M. Bull III

14 Dated: June 8, 2010

COX, WOOTTON, GRIFFIN,
HANSEN & POULOS, LLP
Attorneys for Defendant
BAYSIDE BOATWORKS, INC.

17 By: /S/ Marc T. Cefalu
18 Marc T. Cefalu

19 ~~**PROPOSED**~~ **ORDER**

20 BASED UPON THE STIPULATION OF THE PARTIES, IT IS ORDERED THAT
21 the Case Management Conference Currently scheduled for June 17, 2010, is hereby
22 continued to September 2, 2010.

24 Dated: June 8, 2010

23
24 By: 
25 Magistrate Maria-Elena James

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