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APM TERMINALS PACIFIC LTD

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BRYAN THOMPSON, individual, on behalf of himself and on behalf of The State of California Labor and Workforce Development Agency as a Private Attorney General,

Plaintiff,

vs.

APM TERMINALS PACIFIC LTD, A CALIFORNIA CORPORATION; and DOES 1 through 10, inclusive,

Defendants.

CASE NO. CV-10-677 EMC

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT

[Northern District Local Rule 6-1]

Complaint Filed: February 17, 2010

ORDER

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RECITALS

WHEREAS, Plaintiff BRYAN THOMPSON ("Plaintiff") filed a Complaint on February 17, 2010 in the United States District Court for the Northern District of California against Defendant APM TERMINALS PACIFIC LTD ("Defendant"); and

WHEREAS, Plaintiff served Defendant with a Summons and Complaint in this action on February 24, 2010; and

WHEREAS, based on the foregoing and pursuant to Fed. R. Civ. P. 81(c)(2), Defendant's deadline to respond to Plaintiff's Complaint is March 16, 2010; and

WHEREAS, the parties agree and are stipulating herein pursuant to Local Rule 6-1 to a 21-day extension of time for Defendant to serve and file any responsive pleadings, to and including April 6, 2010.

STIPULATION

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendant through their respective undersigned counsel that:

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- 1. Defendant's time within which to answer or otherwise serve and file any responsive pleadings to Plaintiff's Complaint in this action shall be and hereby is extended by 21 days to and including April 6, 2010; and
- 2. By entering into this Stipulation, Defendant does not waive and expressly reserves all defenses and challenges to Plaintiff's action.

DATED: March 9, 2010

LAW OFFICES OF MICHAEL TRACY

By:  _____
 Michael L. Tracy, Esq.
 Megan Ross Hutchins, Esq.
 Attorneys for Plaintiff
 BRYAN THOMPSON

DATED: March 9, 2010

MCGUIREWOODS LLP

By: /s/ Matthew C. Kane
 Matthew C. Kane, Esq.
 Michelle R. Walker, Esq.
 Sabrina A. Beldner, Esq.
 Sylvia J. Kim, Esq.
 Attorneys for Defendant
 APM TERMINALS PACIFIC LTD

IT IS SO ORDERED

Edward M. Chen
U.S. Magistrate Judge

