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ATTORNEY FOR DEFENDANT TELEGRA, INC.

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

Locke Lord Bissell & Liddell LLP  
 300 South Grand Avenue, Suite 2600  
 Los Angeles, CA 90071

11 ROADWAY ELECTRICAL WORKS, INC., ) Case No. 3:10-cv-01175-JL  
 12 )  
 13 Plaintiff, ) Magistrate Judge James Larson  
 14 v. )  
 15 TELEGRA, INC., a Texas corporation, *et al.* ) **STIPULATED REQUEST FOR**  
 16 Defendant. ) **ENTRY OF ORDER (1)**  
 17 ) **EXTENDING TIME TO FILE**  
 18 ) **RESPONSIVE PLEADING TO**  
 19 ) **PLAINTIFF'S COMPLAINT, AND**  
 20 ) **(2) CONTINUING CASE**  
 21 ) **MANAGEMENT CONFERENCE;**  
 22 ) **~~PROPOSED~~ ORDER**

[Declaration of Vincent J. Hess filed  
 concurrently herewith]

23 Pursuant to the stipulation of the parties, Defendant Telegra, Inc. files this Stipulated  
 24 Request for Entry of Order (1) Extending Time to File Responsive Pleading to Plaintiff's  
 25 Complaint, and (2) Continuing Case Management Conference and shows the following:

26 Andrew Shalauta, counsel for Plaintiff Roadway Electrical Works, Inc. ("Roadway"), has  
 27 agreed to an extension of time until June 18, 2010, for Defendants to file their answers or other  
 28 responsive pleadings to Roadway's Complaint (Dkt. 1). The stipulated extension was  
 memorialized in a May 20, 2010 letter countersigned by Mr. Shalauta. The parties also agree to  
 request that the Case Management Conference currently scheduled for June 23, 2010, be  
 continued to July 20, 2010. The countersigned letter confirming these agreements is attached

1 hereto as Exhibit A and filed with the Court. Pursuant to Civil Local Rule 6-2(a), the  
2 Declaration of Vincent J. Hess, setting forth the information required by Civil Local Rule 6-  
3 2(a)(1)-(3), is submitted with this stipulated request.

4 Accordingly, the parties request entry of an Order as follows:

5 (1) Defendants shall file their answers or other responsive pleadings to Roadway's  
6 Complaint on or before June 18, 2010; and

7 (2) The Case Management Conference currently scheduled for June 23, 2010, is  
8 continued to ~~July 20, 2010~~ July 21, 2010 at 10:30.

9 Respectfully submitted,

10 /s/ Ronald D. Kurtz

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18 Vincent J. Hess, Texas State Bar No. 09540417  
19 (counsel to submit application for admission *pro hac vice*)  
20 LOCKE LORD BISSELL & LIDDELL LLP  
21 2200 Ross Avenue, Suite 2200  
22 Dallas, TX 75201  
23 214-740-8732 Direct  
24 214-756-8732 Fax  
25 vhess@lockelord.com

26 ATTORNEYS FOR DEFENDANT TELEGRA, INC.

27 **PROPOSED ORDER**

28 PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 1, 2010 \_\_\_\_\_

  
UNITED STATES MAGISTRATE JUDGE

Locke Lord Bissell & Liddell LLP  
300 South Grand Avenue, Suite 2600  
Los Angeles, CA 90071

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of May 2010, this **STIPULATED REQUEST FOR ENTRY OF ORDER (1) EXTENDING TIME TO FILE RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT, AND (2) CONTINUING CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER** was electronically filed in the Court's ECF system, and that pursuant to Civil Local Rule 5.4 and General Order No. 45, such filing constitutes service on counsel of record, listed below, through electronic service.

Gregory D. Brown, State Bar No. 065318  
Andrew Shalauta, State Bar No. 186821  
Brendan Brownfield, State Bar No. 266114  
BURNHAM BROWN  
A Professional Law Corporation  
P.O. Box 119  
Oakland, California 94604

/s/ Ronald D. Kurtz  
Counsel for Defendant Telegra, Inc.

LA 647663v.1

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# EXHIBIT “A”

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**Locke Lord Bissell & Liddell**  
Attorneys & Counselors

Vincent J. Hess  
Direct Telephone: 214-740-8732  
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May 20, 2010

VIA EMAIL AND U.S. MAIL

Andrew R. Shalauta, Esq.  
Burnham Brown  
1901 Harrison Street, 11<sup>th</sup> floor  
Oakland, CA 94612

Re: *Roadway Electrical Works, Inc. v. Telegra, Inc. et al.*, Case No. 3:10-cv-01175-JL,  
In the U.S. District Court for the Northern District of California, Oakland Division

Dear Andrew:

This letter is to confirm Roadway Electrical Works, Inc.'s ("Roadway") agreement that defendants have an extension until June 18, 2010, to file an answer or otherwise respond to the complaint in the above-referenced lawsuit. This extension is for the purpose of allowing the parties additional time to engage in further settlement discussions. In addition, the parties agree to request that the Case Management Conference currently scheduled for June 23, 2010, be continued to July 20, 2010.

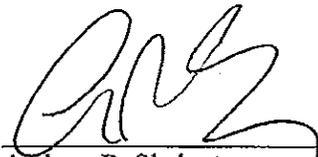
Please sign in the space below to acknowledge your agreement and return this page to me via facsimile or email. Once I receive the executed copy, I will ensure that it is filed with the Court pursuant to Civil Local Rule 6-1(a).

Thank you for your prompt attention to this matter. If you have any questions, please do not hesitate to call.

Sincerely,



Vincent J. Hess



5/20/10

Andrew R. Shalauta  
Attorney for Plaintiff, Roadway Electrical Works, Inc.

VJH/mjo