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Ronald D. Kurtz (SBN 195918)
LOCKE LORD BISSELL & LIDDELL LLP
300 S. Grand Avenue, Suite 2600
Los Angeles, CA 90071-3119
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ATTORNEY FOR DEFENDANT TELEGRA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

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

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

[Declaration of Vincent J. Hess filed
concurrently herewith]

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

Andrew Shalauta, counsel for Plaintiff Roadway Electrical Works, Inc. ("Roadway"), has agreed to an extension of time until July 12, 2010, for Defendants to file their answers or other responsive pleadings to Roadway's Complaint (Dkt. 1). The stipulated extension was memorialized in a June 15, 2010 letter countersigned by Mr. Shalauta. The parties also agree to request that the Case Management Conference currently scheduled for July 21, 2010, be continued to August 18, 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 July 12, 2010; and

7 (2) The Case Management Conference currently scheduled for July 21, 2010, is
8 continued to ~~August 18, 2010~~
August 25, 2010

9 Dated: June 16, 2010

Respectfully submitted,

/s/ Ronald D. Kurtz

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

ATTORNEYS FOR DEFENDANT TELEGRA, INC.

~~**PROPOSED**~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 21, 2010


UNITED STATES MAGISTRATE JUDGE

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

EXHIBIT “A”

6/15/2010 3:28:16 PM

HOKAFONU, AMELIA

^SENDER_OFFICE^

Page 2

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Locke Lord Bissell & Liddell LLP

Attorneys & Counselors

Vincent J. Hess
Direct Telephone: 214-740-8782
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vhess@lockelord.com

June 15, 2010

VIA EMAIL AND U.S. MAIL

Andrew R. Shalauta, Esq.
Burnham Brown
1901 Harrison Street, 11th 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

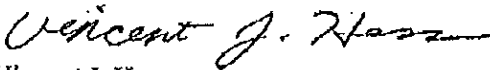
Dear Andrew:

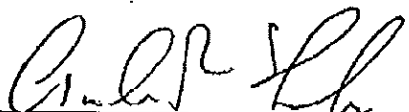
This letter is to confirm Roadway Electrical Works, Inc.'s ("Roadway") agreement that defendants have an extension until July 12, 2010, to file an answer or otherwise respond to the complaint in the above-referenced lawsuit. This extension is for the purpose of allowing the parties additional time to engage in further settlement discussions. In addition, the parties agree to request that the Case Management Conference currently scheduled for July 21, 2010, be continued to August 18, 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

 675-10
Andrew R. Shalauta
Attorney for Plaintiff, Roadway Electrical Works, Inc.

VJH/mjo

DAL:0101351/00005:1940182v1

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June 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 649164v.1

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