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ATTORNEY FOR DEFENDANT TELEGRA, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO 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 James B. McGuire 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.

Andrew Shalauta, counsel for Plaintiff Roadway Electrical Works, Inc. (“Roadway”), has agreed to an extension of time until October 25, 2010, for Defendants to file their answers or other responsive pleadings to Roadway’s Complaint (Dkt. 1), and that the Case Management Conference currently scheduled for August 25, 2010, be continued to December 1, 2010. The countersigned letter confirming these agreements is attached hereto as Exhibit “A” and filed with the Court. Pursuant to Civil Local Rule 6-2(a), the Declaration of James B. McGuire setting

1 forth the information required by Civil Local Rule 6-2(a)(1)-(3), is submitted with this stipulated  
2 request.

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

4 (1) Defendants shall file their answers or other responsive pleadings to Roadway's  
5 Complaint on or before October 25, 2010; and

6 (2) The Case Management Conference currently scheduled for August 25, 2010 is  
7 continued to December 1, 2010.

8 Dated: July 26, 2010

Respectfully submitted,

/s/ Ronald D. Kurtz

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Vincent J. Hess, Texas State Bar No. 09540417  
(counsel to submit application for admission *pro hac vice*)  
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ATTORNEYS FOR DEFENDANT TELEGRA, INC.

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 27, 2010

  
UNITED STATES MAGISTRATE JUDGE

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

# **EXHIBIT “A”**

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## Locke Lord Bissell & Liddell LLP

Attorneys & Counselors

James McGuire  
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 jmcguire@lockelord.com

July 26, 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

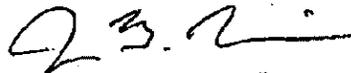
Dear Andrew:

This letter is to confirm Roadway Electrical Works, Inc.'s ("Roadway") agreement that defendants have an extension until October 25, 2010, to file an answer or otherwise respond to the complaint in the above-referenced lawsuit. The dispute between the parties involves a complex commercial contract for work on the Caldecott Tunnel project. Roadway and Telegra, Inc. have exchanged contractual and settlement terms and other information. However, additional time is required because bonding must be arranged and certain terms will require input from Caltrans. This extension is for the purpose of allowing for such additional time so that settlement and other documents can be finalized. In addition, the parties agree to request that the Case Management Conference currently scheduled for August 25, 2010, be continued to December 1, 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,



James McGuire



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

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of July 2010, this **STIPULATED REQUEST FOR ENTRY OF ORDER EXTENDING TIME TO FILE RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT; [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 651476v.1.

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