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9 Attorneys for Plaintiff  
 ROADWAY ELECTRICAL WORKS, INC.

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA

13 ROADWAY ELECTRICAL WORKS, INC.,  
 14 Plaintiff,  
 15 v.  
 16 TELEGRA, INC., a Texas Corporation;  
 TELEGRA-EUROPE, a business entity of  
 17 unknown form, and DOES 1 through 20,  
 Inclusive,  
 18 Defendants.

Case No.: C10-01175 JL

**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**

[Declaration of Andrew R. Shalauta filed  
 concurrently herewith]

Complaint Filed: March 22, 2010

22 Pursuant to the stipulation of the parties, Plaintiff Roadway Electrical Works, Inc. files  
 23 this Stipulated Request for Entry of Order (1) Extending Time To File Responsive Pleading To  
 24 Plaintiff's Complaint, and (2) Continuing Case Management Conference.

25 The parties have agreed to an extension of time until December 17, 2010, for Defendants  
 26 to file their responsive pleadings to Plaintiff's Complaint, and that the Case Management  
 Conference currently scheduled for December 1, 2010, be continued to ~~January 28, 2011~~  
 27 <sup>January 26, 2011</sup>. The  
 28 countersigned letter confirming these agreements is attached hereto as Exhibit "A" and filed

1 with the Court. Pursuant to Civil Local Rule 6-2(a), the Declaration of Andrew R. Shalauta  
2 setting forth the information required by Civil Local Rule 6-2(a)(1)-(3), is submitted with this  
3 stipulated request. The parties are seeking this extension for the purpose of allowing for  
4 necessary additional time to finalize settlement terms and documents, and, arrange bonding  
5 required as part of the settlement.

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

- 7 (1) Defendants shall file their responsive pleadings to Plaintiff's complaint on or before
- 8 December 17, 2010; and
- 9 (2) The Case Management Conference currently scheduled for December 1, 2010 is
- 10 continued to ~~January 28, 2011~~ January 26, 2011.

11  
12 DATED: October 20, 2010

BURNHAM BROWN



ANDREW R. SHALAUTA  
Attorneys for Plaintiff  
ROADWAY ELECTRICAL WORKS, INC.

13  
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17  
18 **PROPOSED ORDER**

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20  
21 Date: November 5, 2010



UNITED STATES MAGISTRATE JUDGE

22  
23  
24  
25 1037183

**EXHIBIT A**

10/20/10

LTR No.: 015

Telegra Inc  
40 Drew Drive  
Eastport , NY 11941  
Phone: 631-379-7140  
Attn: Ron Wolcott

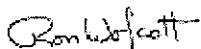
Project: Caldecott Tunnel  
Project No.: 9500

Subject: Roadway Electrical Works, Inc. v. Telegra, Inc. et al., In the U.S. District Court for the Northern District of California, C10-01175 JL

Dear Mr. Wolcott

This letter is to confirm Telegra, Inc.'s ("Telegra") agreement that plaintiff have an extension until December 17, 2010 to file responsive pleading in the above-referenced lawsuit. The dispute between the parties involves a complex commercial contract for work on the Caldecott Tunnel project. Telegra, Inc. and Roadway Electrical Works, Inc. have been working on settlement terms and have agreed upon purchase orders. The parties are close to a settlement agreement but need additional time to work out final issues on the terms. Additional time is also required for the bonding that must be arranged by Telegra. This extension is for the purpose of allowing for such additional time so that settlement terms and documents can be finalized. In addition, the parties agree to request that the Case Management Conference currently scheduled for December 1, 2010, be continued to January 28, 2011.

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, our attorneys will ensure that it is filed with the Court pursuant to Civil Local Rules.

 10/20/2010

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Ron Wolcott, Telegra Inc.

Sincerely,

Luis Martinez  
PM Estimator  
Roadway Electrical Works Inc.  
707-928-0137

LM/lm