

COX, WOOTTON, GRIFFIN,
HANSEN & POULOS, LLP
Mitchell S. Griffin (SBN 114881)
190 The Embarcadero
San Francisco, CA 94105
Email Address: mgriffin@cwghp.com
Telephone No.: 415-438-4600
Facsimile No.: 415-438-4601

Attorneys for Plaintiff
HANJIN SHIPPING CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HANJIN SHIPPING CO., LTD.,

Plaintiff,

v.

CENTRAL BIO-ENERGY
INTERNATIONAL CORP. and HIRSCH
CAPITAL CORPORATION.

Defendants.

Civil Action No.: CV 10 1344 JCS

**HANJIN SHIPPING CO., LTD.'S
REQUEST FOR MORE TIME IN
WHICH TO FILE MOTION FOR
DEFAULT JUDGMENT AND
(PROPOSED) ORDER**

THE REASON FOR THIS REQUEST

Plaintiff HANJIN SHIPPING CO., LTD., ("HANJIN") is an ocean carrier of cargo. The defendants contracted with HANJIN for ocean carriage of goods (bulk corn/grain) from the United States to Korea and, after HANJIN performed the carriage, the defendants failed and refused to pay for the carriage and abandoned the goods in Korea. Defaults have been entered against both defendants and HANJIN is preparing motions for default judgments.

However, an element of the judgments will be the cost to HANJIN of disposing of the goods in Korea – *which has not yet occurred*. The reason for the delay in disposing of the goods is that HANJIN has been informed that it will cost in excess of \$200,000 to dispose of the goods in Korea. Therefore, HANJIN is looking into an alternative to disposal of the goods in Korea (i.e. trying to find a salvage purchaser in Korea or elsewhere, or reshipping the goods out of Korea for disposal elsewhere).

PENDING DEADLINES THAT HANJIN CANNOT MEET

By Order dated July 14, 2010, the Court continued the Case Management

COX, WOOTTON,
GRIFFIN, HANSEN
& POULOS, LLP
190 THE EMBARCADERO
SAN FRANCISCO, CA
94105
TEL: 415-438-4600
FAX: 415-438-4601

Conference to September 17, 2010, and directed HANJIN to file its motions for default judgments on or before September 13, 2010 (30 days from the date of the Court's July 14, 2010 Order). HANJIN now anticipates that its disposal or other disposition of the goods will not be resolved for up to 60 more days and, therefore, the amount of the default judgments to be sought will not be determined within the deadline set by the Court.

REQUEST FOR 60 DAY EXTENSION

HANJIN requests that, in light of these circumstances, the Court grant a 60-day extension of time, up to and including October 12, 2010, in which to file the motions for default judgments. HANJIN is working diligently to dispose of the goods (indeed, HANJIN incurs daily charges for the containers in which the goods are housed) and is optimistic that it will dispose of the goods within that time frame. Until the goods are disposed of, HANJIN's damages will not be determined and filing motions for default will be premature.

Respectfully submitted.

Dated:

COX, WOOTTON, GRIFFIN,
HANSEN & POULOS, LLP
Attorneys for Plaintiff HANJIN SHIPPING
COMPANY, LTD.

By

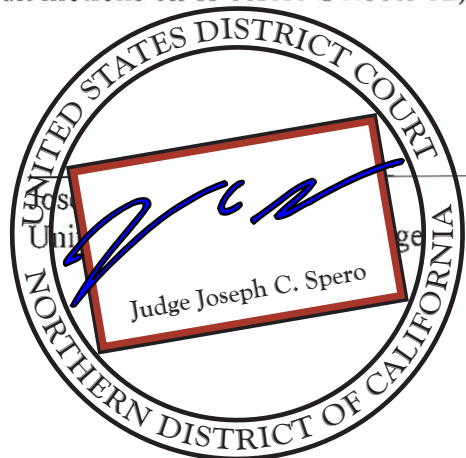
Mitchell Griffin

(PROPOSED) ORDER GRANTING 60 DAY EXTENSION

Pursuant to the above request by plaintiff HANJIN, for additional time in which to file motions for default judgments against the defendants herein, it is hereby

ORDERED, that HANJIN will file its default motions on or before October 12, 2010.

Dated: 08/09/10



COX, WOOTTON,
GRIFFIN, HANSEN
& POULOS, LLP

150 THE EMERALDCADDERO
SAN FRANCISCO, CA
94105
TEL: 415-438-4600
FAX: 415-438-4601