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4 Attorneys for Defendant
VINCENT BACKEN, ET AL.

6 UNITED STATES DISTRICT COURT
7 NOTHERN DISTRICT OF CALIFORNIA

9 INCREDIBLE ADVENTURES, INC., a
10 corporation,

No. CV 10 1389 JSW

11 Plaintiff,

12 v.

**STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO
THE COMPLAINT, GRANTING TIME
TO MOVE TO QUASH ATTACHMENT
HEREIN AND STAYING FURTHER
PROCEEDINGS**

13 VINCENT BACKEN, an individual;
14 JOANNE KEUNE aka JOANNE KEUNE
BACKEN, and individual; and WHITE
15 HOLLY EXPEDITIONS, LLC, a limited
liability company,

16 Defendants.

17 _____ /

18 WHEREAS the named Defendants herein, being VINCENT BACKEN, JOANNE KEUNE
19 BACKEN and WHITE HOLLY EXPEDITIONS, LLC, have agreed, through their counsel John
20 Meadows, with Plaintiff INCREDIBLE ADVENTURES, INC., through its counsel, Mark K. de Langis,
21 to appear in the within action generally but need additional time in which to file said pleading because
22 the attorney for the Defendants, John Meadows, is undergoing a surgical procedure on his heart on
23 Wednesday, 28 July, 2010, at California Pacific Medical Center in San Francisco and will be
24 hospitalized for at least 24 hours thereafter. He will then be required to rest at home for the remainder of
25 the week, and

26 WHEREAS the sum of \$150,000 belonging to Defendant WHITE HOLLY EXPEDITIONS,
27 LLC, which is on deposit with Wells Fargo Bank, 715 Bridgeway Street, Sausalito, California 94965, has
28

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1 been subjected by Plaintiff to a writ of maritime attachment under Rule B, Supplemental Rules for
2 Admiralty or Maritime Claims, FRCivP, and Defendants anticipate making a motion to quash said
3 attachment on what Defendants contend are good and sufficient grounds, including failure to give
4 notice of said attachment to Defendants, Vincent Backen and WHITE HOLLY EXPEDITIONS, LLC,
5 owners of said bank account, which motion Plaintiff intends to oppose, and

6 WHEREAS Defendants are informed and believe that Wells Fargo Bank intends to transfer the
7 attached funds directly to Plaintiff on July 29, 2010, despite Defendants' contention, expressed to said
8 bank by Defendant Vincent Backen and his attorney herein, that there is no authority from the Court to
9 do so and there is not even a judgment against Defendants, now therefore

10
11 IT IS HEREBY STIPULATED by and between the attorneys for Plaintiff and Defendants that
12 all proceedings in the within case, including enforcement of the writ of maritime attachment referred to
13 above, shall be stayed until such time as Defendants' motion to quash is heard by this Court and that
14 Defendants shall have till August 13, 2010, in which to file an Answer or other responsive pleading to
15 the Complaint herein, and have until August 20, 2010, in which to file the motion to quash or otherwise
16 move against the writ of maritime attachment obtained by Plaintiff, and

17 IT IS FURTHER ORDERED that a copy of the within Stipulation and Order be forwarded by the
18 attorneys for the parties herein to Wells Fargo Bank at the above address forthwith.

19
20 Dated: July 26, 2010

Mark K. de Langis

Lucas Valley Law


/s/ Mark K. de Langis

Attorneys for Plaintiff

21
22
23
24 Dated: July 26 2010

John F. Meadows

Hoagland Longo Moran Dunst & Doukas



Attorneys for Defendants

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ORDER

IT IS SO ORDERED this 27th day of July, 2010.



The Honorable Jeffrey S. White
United States District Judge
Northern District of California

Hoagland, Longo,
Moran, Dunst
& Doukas, LLP
Attorneys at Law

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