

1 Peter M. Hart (SBN 107920)
Peter.hart@leclairryan.com
2 Michele C. Kirrane (SBN 215448)
LECLAIRRYAN LLP
3 44 Montgomery Street, 18th Floor
San Francisco, CA 94104
4 Tel: 415-391-7111
Fax: 415-391-8766

5
6 Attorneys for Third Party Defendant
ROLLS-ROYCE NAVAL
MARINE, INC.
7

8 UNITED STATES DISTRICT COURT
9
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 GOLDEN GATE BRIDGE HIGHWAY AND
TRANSPORTATION DISTRICT, a public
13 entity; and LEXINGTON INSURANCE
COMPANY, a corporation,

14 Plaintiffs,

15 v.

16 BLUE & GOLD FLEET, INC., a California
Corporation; BLUE & GOLD FLEET, L.P., a
17 Delaware limited partnership

18 Defendants.

CASE NO. C 10-2387 SC

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF TIME
TO COMPLETE ADR PROCESS**

19 AND RELATED CROSS-ACTION
20

21 WHEREAS pursuant to the Court's Order of April 5, 2011, the parties currently have until
22 November 30, 2011 to complete mediation;

23 WHEREAS the parties to this action filed a Joint Case Management Statement and Rule
24 26(f) Statement on June 17, 2011;

25 WHEREAS the parties agree that the deadline to complete the ADR process should be
26 continued so as to allow the parties the opportunity to conduct additional discovery regarding
27 third party practice issues that the third parties desire to conduct relating to these issues;
28

1 IT IS HEREBY STIPULATED and agreed that the date by which to complete mediation
2 shall be extended until December 30, 2011. Mediation is scheduled to take place on December
3 12, 2011.

4 Dated: November 22, 2011

LECLAIRRYAN LLP

5 By: /s/
6 PETER M. HART

7 Attorneys for Third Party Defendant
8 ROLLS-ROYCE NAVAL MARINE, INC.
as successor to BIRD JOHNSON

9 Dated: November 22, 2011

COZEN O'CONNOR

10 By: /s/
11 Kevin D. Bush

12 Attorneys for Plaintiffs
13 GOLDEN GATE BRIDGE HIGHWAY AND
14 TRANSPORTATION DISTRICT and
LEXINGTON INSURANCE COMPANY

15 Dated: November 22, 2011

EMARD DANOFF PORT TAMULSKI & PAETZOLD,
16 LLP

17 By: /s/
18 James Joseph Tamulski
Talcott N. Bates

19 Attorneys for Defendant and Third-Party Plaintiff
20 BLUE AND GOLD FLEET, LP

21 Dated: November 22, 2011

GIBSON ROBB & LINDH, LLP

22 By: /s/
23 Geoffrey Robb
24 Marisa G. Huber

25 Attorneys for Third-Party Defendant
26 SOUND PROPELLER SERVICES, INC.

27 ///
28 ///

CERTIFICATE OF SIGNATURE

I, Peter M. Hart, attest that the content of this document is acceptable to all parties, and that all counsel have authorized me to sign the document on their behalf.

By:

/s/

PETER M. HART

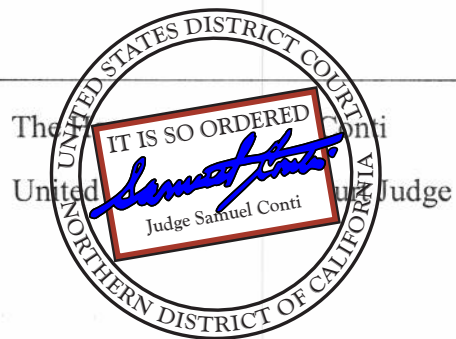
ORDER

Good cause appearing therefore, PURSUANT TO STIPULATION, IT IS SO

ORDERED:

The date by which to complete mediation shall be extended until December 30, 2011.

DATED: 11/22/11



CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2011, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send a notification of electronic filing to the following CM/ECF:

Kevin Dale Bush

Cozen & O'Connor
501 W Broadway #1610
San Diego, CA 92101
619-234-1700
Fax: 619-234-7831
Email: kbush@cozen.com

James Joseph Tamulski

Emard Danoff Port Tamulski &
Paetzold LLP
49 Stevenson Street, Suite 400
San Francisco, CA 94105
415-227-9455
Email: jtamulski@edptlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Talcott Neal Bates

Emard Danoff Port Tamulski &
Paetzold LLP
49 Stevenson Street, Suite 400
San Francisco, CA 94105
415-227-9455
Fax: 415-227-4255
Email: tbates@edptlaw.com

Marisa G. Huber

Gibson Robb & Lindh LLP
201 Mission Street, Suite 2700
San Francisco, CA 94105
415-979-2344
Fax: 415-348-6001
Email: mhuber@gibsonrobb.com

Respectfully Submitted by,

By:

/s/

PETER M. HART (SBN 107920)
Peter.hart@leclairryan.com
LECLAIRRYAN LLP
44 Montgomery Street, 18th Floor
San Francisco, CA 94104
Tel: 415-391-7111
Fax: 415-391-8766