

1 Ronald C. Chauvel (SBN 083182) [email: rcc@chauvelabraham.com]
April S. Glatt (SBN 185708) [email: asg@chauvelabraham.com]
2 CHAUVEL, ABRAHAM, DESCALSO, LLP.
155 Bovet Road, Suite 780
3 San Mateo, California 94402
Telephone: 650-573-9500
4 Facsimile: 650-573-9689

5 Attorneys for Plaintiff,
Kenneth Laxer, an individual
6

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 (San Francisco/Oakland Division)

10 KENNETH LAXER, an individual,)
11 Plaintiff,)

12 v.)

13 WORLDWIDE CARGO SERVICES,)
14 INC., a New York corporation;)
FORWARD AIR, INC., a Tennessee)
15 corporation; and CLOCK)
16 FREIGHT INTERNATIONAL,)
INC., a California corporation,)

17 Defendants.)

CASE NO. CV 11-1861 JCS

**STIPULATION AND ORDER
TO SET ASIDE DEFAULT
AGAINST DEFENDANT
CLOCK FREIGHT
INTERNATIONAL, INC.**

18 COME NOW Plaintiff Kenneth Laxer ("Plaintiff") and Defendant Clock Freight
19 International, Inc. ("CLOCK") (collectively referred to as the "Parties") and jointly
20 stipulate to an order to set aside the default entered against CLOCK.
21

22 On or about April 18, 2011, Plaintiff filed a Complaint for damages in the above
23 referenced matter. On April 22, 2011, Plaintiff served the Complaint on CLOCK.

24 On June 23, 2011, Plaintiff requested that the Court enter default in the above captioned
25 matter against CLOCK on the grounds that it had failed to respond to the Complaint. On
26 or about June 30, 2011, CLOCK received notice that the request for default had been filed
27 against it. The Court entered default against CLOCK on July 1, 2011.
28

1 On or about July 6, 2011, counsel for Plaintiff and for CLOCK discussed the default
2 and the delay in filing an answer. Plaintiff agreed to set aside the default entered against
3 CLOCK and to permit CLOCK to answer or otherwise plead in a timely manner.

4 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED TO
5 by the Parties, that the entry of default against CLOCK may be set aside so that CLOCK
6 may Answer or otherwise plead in a timely manner.

7 **STIPULATED AND AGREED TO BY AND AMONG:**

8
9 DATED: July 13, 2011 CHAUVEL ABRAHAM & DESCALSO, LLP
10 /s April S. Glatt

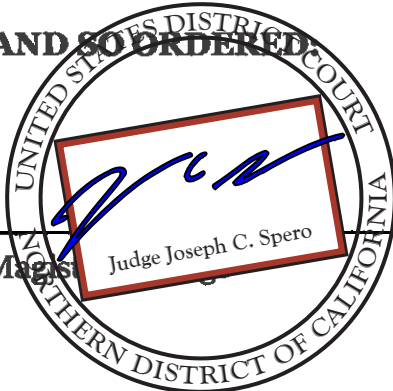
11
12 APRIL S. GLATT
13 Attorney for Plaintiff
14 KENNETH LAXER

15
16
17 DATED: July 13, 2011 ANDERSON & POOLE, P.C.
18 /s Jamie Couche

19
20 JAMIE C. COUCHE
21 Attorneys for Defendant
22 CLOCK FREIGHT INTERNATIONAL, INC.

23 **APPROVED AND SO ORDERED**

24 Dated: 7/19/11



25
26
27 United States Magistrate