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9 Attorneys for Defendants
 PAYLESS SHOE SOURCE, INC, and
 10 COLLECTIVE BRANDS, INC.

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
 13 **SAN FRANCISCO DIVISION**

14 NATIONAL UNION FIRE INSURANCE)
 15 COMPANY OF PITTSBURGH, PA.,)
 16 Plaintiff,)
 17 vs.)
 18 PAYLESS SHOE SOURCE, INC. and)
 19 COLLECTIVE BRANDS, INC.,)
 20 Defendants.)
 21 _____)

Case No. CV 11-01892-EMC

**JOINT STIPULATION AND [PROPOSED]
 ORDER CONTINUING CASE
 MANAGEMENT CONFERENCE AND
 RELATED DEADLINES**

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12 for the Northern District of
2 California, Defendants Payless Shoe Source, Inc. and Collective Brands, Inc. and Plaintiff National
3 Union Fire Insurance Company of Pittsburgh, PA (collectively, with Defendants, the “Parties”), by and
4 through their respective counsel, submit this Joint Stipulation and [Proposed] Order Continuing Case
5 Management Conference and Related Deadlines.

6 WHEREAS, on April 19, 2011, Plaintiff filed its Complaint (Docket Entry (hereinafter,
7 “D.E.”) 1);

8 WHEREAS, on May 26, 2011, the Parties entered into a stipulation extending
9 Defendants’ time to answer, move, or otherwise respond to the Complaint until July 19, 2011 (D.E. 8);

10 WHEREAS, on July 13, 2011, the Parties entered into a stipulation further extending
11 Defendants’ time to answer, move, or otherwise respond to the Complaint until August 18, 2011 (D.E.
12 14), which the Court so-ordered on July 14, 2011 (D.E. 15);

13 WHEREAS, on July 19, 2011, the Court entered a Case Management Conference Order
14 in Reassigned Cases that (1) set a case management conference for August 19, 2011 (the “Case
15 Management Conference”), (2) directed the Parties to file a joint case management statement by August
16 12, 2011, and (3) directed the Parties to make any request to reschedule the Case Management
17 Conference, if at all, in writing and by stipulation no later than August 9, 2011 (D.E. 16);

18 WHEREAS, pursuant to Civil Local Rule 26(f), the Parties must meet and confer prior to
19 the Case Management Conference no later than July 29, 2011;

20 WHEREAS, the Parties currently are engaged in settlement discussions and wish to
21 continue the Case Management Conference and related deadlines in order to avoid incurring
22 unnecessary costs and expending unnecessarily the Court’s time;

23 NOW, THEREFORE, THE PARTIES JOINTLY STIPULATE TO, AND REQUEST
24 THE COURT TO ORDER, THE FOLLOWING:

- 25 1. The Case Management Conference shall be continued until September 23, 2011, or until
26 another, later date to be chosen by the Court;

- 1 2. The currently-scheduled deadlines to meet and confer by July 29, 2011 and to file a joint
2 case management statement by August 12, 2011 shall be vacated and rescheduled
3 pursuant to the date set for the rescheduled Case Management Conference;
4 3. By entering into this Stipulation, the Parties do not waive, and expressly preserve, any
5 and all rights, claims and defenses, including all defenses relating to jurisdiction, venue
6 and arbitrability.

7
8 Respectfully submitted,

9 Dated: July 27, 2011

Dated: July 27, 2011

10 /s/ Bruce D. Celebrezze
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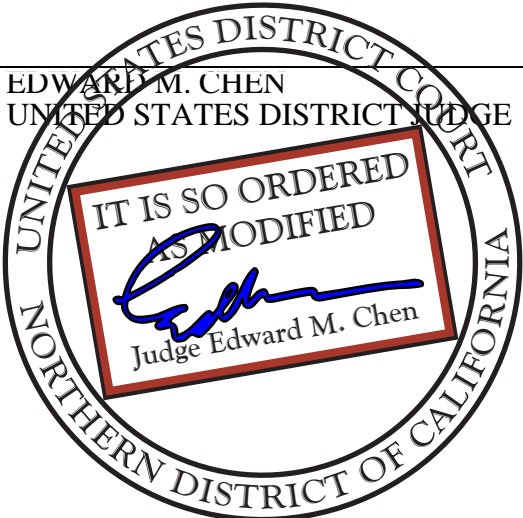
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PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, **IT IS SO**

ORDERED. The CMC is reset from 8/19/11 to 10/7/11 at 9:00 a.m. A joint CMC Statement shall be filed by 9/30/11.

Dated: 7/28/11

EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE



1 I, Robert A. Sacks, am the ECF User whose ID and password are being used to file this
2 Joint Stipulation and [Proposed] Order Continuing Case Management Conference and Related
3 Deadlines. In compliance with General Order 45, X.B., I hereby attest that Bruce D. Celebrezze has
4 concurred in this filing.

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Dated: July 27, 2011

/s/ Robert A. Sacks

Robert A. Sacks