

1 JOHN W. COTTON (Cal. Bar No. 93831)
jcotton@cglp.com
2 AARON C. GUNDZIK (Cal. Bar No. 132137)
agundzik@cglp.com
3 COTTON & GUNDZIK LLP
624 So. Grand Avenue, 22nd Floor
4 Los Angeles, CA 90017
Telephone: 213/312-1330
5 Telecopy: 213/623-6699

6 Attorneys for Defendant
Tracker Marine, LLC

7
8 BRIAN J. BICKEL (SBN 205646)
AMANDA L. GRAY (SBN 244644)
amandagr@bickellawfirm.com
9 BRIAN C. KLINE (SBN 246747)
THE BICKEL LAW FIRM, INC.
10 1950 Symphony Towers, 750 B Street
San Diego, California 92101-8107
11 Telephone: 619.374.4100
Facsimile: 619.231.9040

12 Attorneys for Plaintiff Adam Eckenwiler

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 ADAM ECKENWILER,

17 Plaintiff,

18 v.

19 TRACKER MARINE, LLC, and DOE
20 1 through DOE 10 inclusive,

21 Defendants.

Case No. CV11-2255 JCS

**SECOND STIPULATION TO
EXTEND TIME TO RESPOND
TO COMPLAINT**

22
23 The parties to this action, through their undersigned counsel of record,
24 hereby stipulate as follows:

25 1. The parties are currently engaged in settlement discussions and
26 would like to continue and potentially complete the process before Defendant's
27 response to the Complaint is due.
28

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

1 2. In accord with a previous stipulation approved by the Court on June
2 1, 2011, Defendant's response is currently due on June 16, 2011.

3 3. Plaintiff's counsel will be on vacation from June 16 through June 26,
4 2011 and therefore the parties will be unable to complete any settlement
5 discussions during that period.

6 4. Consequently, pursuant to Local Rule 6-1(a), the parties agree to an
7 additional four week extension of Defendant's deadline for responding to the
8 Complaint – to July 14, 2011.

9 5. As required by Local Rule 6-1(b), Defendant's new response date
10 will not interfere with any event or deadline already fixed by the Court, including
11 the case schedule set forth in the Court's May 6, 2011 Order Setting Initial Case
12 Management Conference and ADR Deadlines.

13 DATED: June 15, 2011

COTTON & GUNDZIK LLP

Aaron C. Gundzik
Aaron C. Gundzik

Attorneys for Defendant
Tracker Marine, LLC

17 DATED: June 15, 2011

THE BICKEL LAW FIRM, INC

Armanda L. Gray
Armanda L. Gray

Attorneys for Plaintiff
Adam Eckenwiler

20 Dated: June 20, 2011

