

A. RAYMOND HAMRICK, III \*o  
 DAVID L. EVANS \*o  
 WILLIAM G. KELSBERG  
 KENNETH A. HEARN  
 KENNETH C. GREENE  
 ERIC DOBBERSTEIN ‡  
 DOUGLAS K. LACKEY \*  
 KENNETH A. KOTARSKI  
 DANIEL J. QUISENBERRY  
 JEFFREY A. WHITE  
 ELLIE WIEDER  
 SVETLANA KUPERMAN  
 JUSTIN F. CRONIN  
 REBECCA L. WORDEN ♦  
 W. JOSEPH ANDERSON  
 RHONDA LONG ‡

**HAMRICK & EVANS, LLP**  
 111 UNIVERSAL HOLLYWOOD DRIVE  
 SUITE 2200  
 UNIVERSAL CITY, CALIFORNIA 91608  
 TELEPHONE (818) 763-5292  
 FACSIMILE (818) 763-2308  
 WWW.HAMRICKLAW.COM

**NEVADA OFFICE**  
 8965 S. EASTERN AVENUE, SUITE 280  
 LAS VEGAS, NEVADA 89123  
 TELEPHONE (702) 382-4002  
 FACSIMILE (702) 382-1661

OF COUNSEL:  
 MARTIN J. BARAB  
 GEORGE KNOPFLER  
 JAMES M. PAZOS

\*ALSO ADMITTED IN NEVADA  
 oALSO ADMITTED IN COLORADO  
 ♦ALSO ADMITTED IN NEW YORK  
 ‡ADMITTED IN NEVADA ONLY

February 9, 2012

**VIA ELECTRONIC FILE**

Magistrate Judge Maria-Elena James  
 San Francisco Courthouse  
 Courtroom B – 15<sup>th</sup> Floor  
 450 Golden Gate Avenue  
 San Francisco, CA 94102  
 Attention: Brenda Tolbert, Clerk



**Re: *MBL, Inc. vs. ACE Property and Casualty Insurance Company.***  
**United States District Court, Northern District of California**  
**Case No. 11-05358 MEJ**  
**Our Client : MBL, Inc.**

Dear Judge James:

This correspondence shall serve to request that all currently scheduled dates in the above referenced action (the “Action”) be continued for a period of sixty (60) days following the last date to serve the summons and complaint on all defendants pursuant to *Federal Rules of Civil Procedure*, Rule 4(m).

This action was instituted following the break-down of discussions between Plaintiff MBL, Inc., and Defendant ACE Property and Casualty Insurance Company. Settlement discussions resumed after the filing of the Action but before the Summons and Complaint had been served on Defendant. As such, Plaintiff delayed in effecting service in the hopes of achieving an amicable settlement between the parties.

Plaintiff filed the Action on November 4, 2011. Pursuant to Rule 4(m), Plaintiff has until March 2, 2012 to serve all defendants before risking dismissal of the Action. Plaintiff intends to either effect service of process or dismiss the matter on or before March 2, 2012. Therefore, Plaintiff respectfully requests that the date for submission of the Rule 26(f) Report and Case Management Statement, currently set for February 9, 2012, and the Initial Case Management Conference, currently scheduled for February 16, 2012, as well as any other currently scheduled dates, be continued for a period of sixty (60) days beginning on March 2, 2012.

HAMRICK & EVANS, LLP

February 9, 2012

Page 2

We would appreciate it if you could let us know as soon as possible whether this will be acceptable. Thank you for your consideration.

Very truly yours,

*W. Joseph Anderson*

W. Joseph Anderson

The Case Management Conference is continued to May 3, 2012 at 10:00 a.m. in Courtroom B. All deadlines are adjusted accordingly.

Dated: February 10, 2012

