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15 Attorneys for Plaintiff
16 MITSUI O.S.K. LINES, LTD.

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19 IN THE UNITED STATES DISTRICT COURT
20
21 NORTHERN DISTRICT OF CALIFORNIA
22

23 MITSUI O.S.K. LINES, LTD.

24 Plaintiff,

25 vs.

26 GLOBAL ALLIANCE LOGISTICS (L.A.),
27 INC.; GLOBAL ALLIANCE LOGISTICS
28 (MIA), INC.; GLOBAL ALLIANCE
LOGISTICS (NYC), INC.; and DOES 1
through 20,

Defendants.

) Case No.: CV 12 0936 MEJ

) **CASE MANAGEMENT STATEMENT**

) Complaint Filed: February 24, 2012

) Further CMC: None set
) Pretrial Conference: August 8, 2013
) Trial Date: August 12, 2013
) Courtroom B, 15th Floor

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31 **CASE MANAGEMENT CONFERENCE STATEMENT**

32 Plaintiff Mitsui O.S.K. Lines, Ltd. (“MOL”) and defendants GLOBAL ALLIANCE
33 LOGISTICS (L.A.), INC.; GLOBAL ALLIANCE LOGISTICS (MIA), INC.; GLOBAL
34 ALLIANCE LOGISTICS (NYC), INC. (“Global Alliance”) submit this further status report,
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1 reporting progress and changes since the last statement and providing the parties' views about
2 ADR, as required by Local Rule 16-10(d).

3 **I. DISCOVERY**

4 MOL and Global Alliance have engaged in both formal and informal discovery and
5 exchange of information, as part of their efforts to reach informal resolution of this matter.
6 Initial disclosures and MOL's expert disclosure has taken place. The parties agreed to postpone
7 certain discovery procedures (i.e. the 30(b)(6) deposition of Global Alliance, Global Alliance's
8 rebuttal expert designation, and expert depositions) in hopes that the expense of such procedures
9 would serve as a motivation towards settlement, and because there is sufficient time to complete
10 these procedures without affecting the Court's trial date or other deadlines. The parties therefore
11 respectfully request the Court's approval, of the following continued deadlines:

12 May 15, 2013 – To complete all timely-noticed depositions and for Global Alliance to
13 disclose a rebuttal expert (if any); and,

14 June 15, 2013 – To complete expert depositions, if any.

15 **IV. RELATED CASES.**

16 Though found not to be "related" as defined by the Local Rules, two similar cases
17 recently concluded trial before Judge Conti, *MOL v. Seamaster, et al.*, 10-CV-5586 SC and 11-
18 CV-2861. The parties are presently reviewing the Court's Findings of Fact and Conclusions of
19 Law in that matter insofar as they may also bear on issues in this case.

20 **V. SETTLEMENT AND ADR.**

21 The case has been assigned to mediator Jack Skelton. The parties have engaged in
22 running settlement discussions and have determined to complete informal settlement discussions
23 by April 5, 2013. If these discussions have not resulted in settlement, they will schedule
24 mediation with Mr. Skelton to be completed by the end of May 2013. As an added incentive and
25 motivation, the parties request that the Court order in-person attendance of party representatives.
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DATED: March 28, 2013

FLYNN, DELICH & WISE LLP

/s/

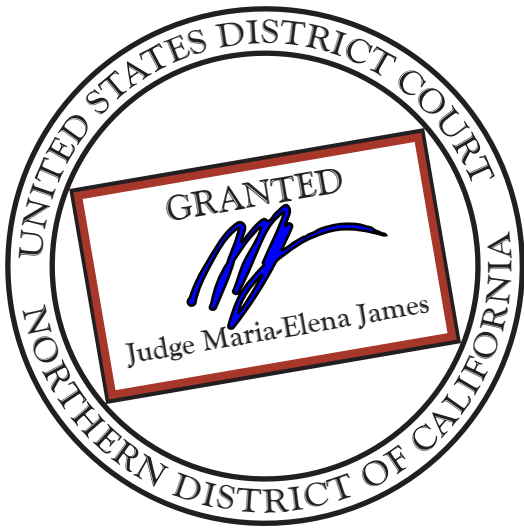
By: _____
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Conte C. Cicala
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MITSUI O.S.K. LINES, LTD.

DATED: March 28, 2013

KAYE, ROSE & PARTNERS, LLP

/s/

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Daniel Berberich
Attorneys for Defendants
GLOBAL ALLIANCE LOGISTICS (L.A.),
INC.; GLOBAL ALLIANCE LOGISTICS
(MIA), INC.; GLOBAL ALLIANCE
LOGISTICS (NYC), INC.



Parties requests are GRANTED.
Dated: 4/2/2013