

1 Scott A. Brown, SBN 177099
 David M. Poore, SBN 192541
 2 BROWN | POORE LLP
 1350 Treat Blvd., Suite 400
 3 Walnut Creek, California 94597
 Telephone: (925) 943-1166
 4 Facsimile: (925) 943-1164
sbrown@bplegalgroup.com
 5 **Attorneys for Plaintiffs,**
 LILLIAN GRADILLAS, CHRIS GRADILLAS

6 GEORGE D. YARON, ESQ. (State Bar #96246), gyaron@yaronlaw.com
 7 HENRY M. SU, ESQ. (State Bar #171853), hsu@yaronlaw.com
 BRENTLEY P. YIM, ESQ. (State Bar #267332), byim@yaronlaw.com
 8 YARON & ASSOCIATES
 601 California Street, 21st Floor
 9 San Francisco, California 94108
 Telephone: (415) 658-2929

11 J. ANTHONY CAROZZA, tony.carozza@rsg-law.com (*Pro Hac Vice*)
 CHRISTOPHER L. LAFON, chris.lafon@rsq-law.com (*Pro Hac Vice*)
 12 RUBERRY, STALMACK & GARVEY LLC
 500 W. Madison St., Ste. 2300
 13 Chicago, IL 60661
 Telephone (312) 466-7217
 14 **Attorneys for Defendants,** Lincoln General Insurance Company
 Pro IS, Inc. Walshire Assurance Company
 15 Kingsway Financial Services, Inc., Kingsway America, Inc.

17 **UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

18 LILLIAN GRADILLAS; CHRIS GRADILLAS,
 19 individually and as assignees of
 KENNETH NWADIKI, JR. dba AMERICA BUS
 20 LINE,
 Plaintiffs,

21 v.

23 LINCOLN GENERAL INSURANCE COMPANY;
 PRO INSURANCE SOLUTION LIMITED; PRO
 24 IS, INC. (DOE 1); WALSHIRE ASSURANCE
 COMPANY (DOE 2); KINGSWAY FINANCIAL
 25 SERVICES, INC. (DOE 3); TAWA, PLC (DOE 4);
 LGIC HOLDINGS (DOE 5); KINGSWAY
 26 AMERICA, INC. (DOE 6); and DOES 7 through
 10,

27 Defendants.
 28

Case No. 3:12-cv-03697-CRB

**STIPULATION RE:
 ADMINISTRATIVE MOTION TO
 EXTEND TIME TO FILE
 OPPOSITION TO MOTION FOR
 SANCTIONS
 [Civ. L.R. 7-11]**

Dept.: Courtroom 6, 17th Floor

*Action Filed: February 23, 2012
 Trial Date: None*

1 The parties through their respective counsel of record enter into the following stipulation
2 regarding Plaintiffs' Administrative Motion to Extend Time in which to file and serve an
3 Opposition to Defendants' Motion for Sanctions under Federal Rule of Civil Procedure 11. [Doc.
4 No. 68.](“Administrative Motion”).
5

6 Whereas, Defendants opposed Plaintiffs' Administrative Motion to Extend Time in which
7 to file and serve an Opposition to Defendants' Motion for Sanctions (Dkt. 69) (“Opposition”) on
8 several grounds, including the lack of a meet and confer regarding the requested relief under
9 Local Rule 7-11.

10 Whereas, upon Plaintiffs' request and after Defendants filed their Opposition, Plaintiffs
11 and Defendants participated in a meet and confer regarding Plaintiffs' requested relief in
12 Plaintiffs' Administrative Motion on November 10, 2012.

13 Whereas, in entering into this stipulation, Defendants do not stipulate that Plaintiffs have
14 shown good cause to extend the time in which to file an Opposition to Defendants' Motion for
15 Sanctions;

16 Whereas, Defendants do not stipulate to Plaintiffs' request for an extension of time in
17 Plaintiffs' Administrative Motion in which to file an Opposition to Defendants' Motion for
18 Sanctions.;

19 Whereas, Plaintiffs have sought in their Administrative Motion an extension of time in
20 which to file an Opposition to the Motion for Sanctions and set forth a proposed briefing
21 schedule;

22 The parties hereby stipulate to the proposed briefing schedule for Opposition and Reply
23 Briefs in response to Defendants' Motion for Sanctions [Doc. No. 57] if and only if the Court
24 grants Plaintiffs the relief sought in their Administrative Motion to the following briefing
25 schedule:

- 26 ➤ Opposition Due Date: November 21, 2012
27 ➤ Reply Due Date: November 30, 2012
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

➤ Hearing Date: December 14, 2012 (as currently set)

SO STIPULATED

Dated: November 12, 2012

BROWN | POORE LLP

By: //David M. Poore//
David M. Poore
Attorneys for Plaintiffs

Dated: November 12, 2012

RUBERRY, STALMACK & GARVEY LLC

By: // J. Anthony Carozza//
J. Anthony Carozza
Attorneys for Defendants

