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5 Attorney for Plaintiffs
 AMERICAN PRESIDENT LINES, LTD. and
 6 APL CO. Pte., LTD.

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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

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11 APL CO. Pte., LTD, a corporation, and
 AMERICAN PRESIDENT LINES, LTD., a
 12 corporation,
 13 Plaintiffs,
 v.
 14 EXPORT INTERNATIONAL, INC., a
 15 corporation,
 16 Defendant.

No. C 12-4459 EMC

**STIPULATED REQUEST FOR
 ORDER GRANTING RELIEF FROM
 CASE MANAGEMENT SCHEDULE**

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18 Pursuant to Civil Local Rules 6-1(b), 6-2(a), 7-12, and 16-2(d) and (e), plaintiffs
 19 American President Lines, Ltd. and APL Co. Pte., Ltd. (collectively "APL") and defendant
 20 Export International, Inc. ("EI") request an order granting relief from the Case Management
 21 Schedule in the above-captioned matter.

22 No previous time modifications to the Case Management Schedule have been requested
 23 or granted. However, the parties have concurrently filed a Stipulated Request to Further Extend
 24 the Time to Respond to Complaint.

25 The requested enlargement of time/ relief from the Case Management Schedule is sought
 26 because APL and EI seek to explore all avenues of an early disposition of this dispute and are in

1 the process of exchanging documents and information to that end. EI's counsel has recently
 2 provided to APL's counsel a letter brief, including documents, supporting EI's position in this
 3 matter. APL and EI are actively engaged in settlement discussions. The parties believe it would
 4 be beneficial to allow them to seek a possible resolution of the matter, and thereby request relief
 5 from the Case Management Schedule. (See Declaration of Mark K. de Langis, filed in support of
 6 this Stipulated Request.)

7 IT IS HEREBY STIPULATED by and between plaintiff APL and defendant EI that the
 8 Case Management Schedule shall be vacated and amended to reflect the following dates:

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Date	Event	Governing Rule
1/18/2013	Last day to meet and confer re initial disclosures, early settlement, ADR process selection, and discovery plan	FRCP 26(f) ADR L.R. 3-5
1/18/2013	Last day to file Joint ADR Certification with Stipulation to ADR process or Notice of Need for ADR Phone Conference	Civil L.R. 16-8 & ADR. L.R. 3-5(b)
1/18/2013	File either Stipulation to ADR Process or Notice of Need for ADR Phone conference	Civil L.R. 16-8© & ADR L.R. 3-5(b) & (c)
1/31/2013	Last day to complete initial disclosures or state objection in Rule 26(f) Report, file/serve Case Management Statement, and file/serve Rule 26(f) Report	FRCP 26(a)(1) Civil L.R. 16-9
2/7/2013	Case Management Conference in Courtroom 5, 17 th Floor, SF at 9:00 a.m.	Civil L.R. 16-10

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19 DATED: December 14, 2012

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LUCAS VALLEY LAW

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By: /s/ Mark K. de Langis
 Mark K. de Langis
 Attorneys for Plaintiffs
 AMERICAN PRESIDENT LINES, LTD.
 APL Co. Pte., Ltd.

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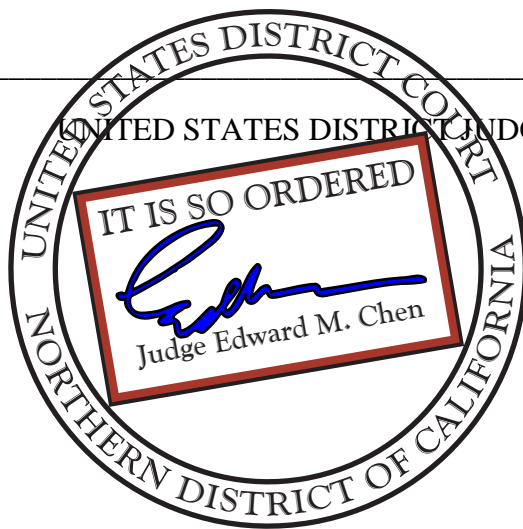
DATED: December 14, 2012

HELTZEL, WILLIAMS, YANDELL, ROTH,
SMITH, PETERSEN & LUSH, P.C.

By: /s/ Michael C. Petersen
Michael C. Petersen
Attorneys for Defendant
EXPORT INTERNATIONAL, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 12/18/12



ATTESTATION PURSUANT TO CIVIL L.R. 5.1

I, Mark K. de Langis, attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document

/s/ Mark K. de Langis

Mark K. de Langis