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

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UNITED STATES DISTRICT COURT

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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,

14 v.

15 EXPORT INTERNATIONAL, INC., a
 corporation,

16 Defendant.

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No. C 12-4459 EMC

**SECOND STIPULATED MOTION TO
 EXTEND THE TIME TO RESPOND
 TO THE COMPLAINT**

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Pursuant to Civil Local Rule 6-2, plaintiffs American President Lines, Ltd. and APL Co.
 19 Pte., Ltd. (collectively "APL") and defendant Export International, Inc. ("EI") request an order
 20 extending the time for EI to file an appearance in this matter.

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One previous time modification regarding EI's appearance deadline has been requested
 22 and granted. The parties have concurrently filed a Second Stipulated Request for Order Granting
 23 Relief from Case Management Schedule.

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This second request to extend EI's appearance deadline is sought to allow APL and EI
 25 time to finalize a settlement agreement. The parties have agreed on the amount of a settlement
 26 payment from EI to APL. However, a term of the proposed settlement involves APL entering

SECOND STIPULATED MOTION TO EXTEND THE TIME TO RESPOND TO THE COMPLAINT

1 into a shipping contract with EI. An enlargement of the time for the Case Management Schedule
2 will allow the parties to negotiate the terms of that contract and complete the settlement. (*See*
3 Declaration of Mark K. de Langis, filed in support of this Second Stipulated Motion.)

4 IT IS HEREBY STIPULATED by and between plaintiff APL and defendant EI that EI's
5 appearance deadline be extended to February 1, 2013.

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7 DATED: January 17, 2013

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LUCAS VALLEY LAW

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By: /s/ Mark K. de Langis

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Mark K. de Langis

Attorneys for Plaintiffs

AMERICAN PRESIDENT LINES, LTD.

APL Co. Pte., Ltd.

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DATED: January 17, 2013

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

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By: /s/ Michael C. Petersen

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Michael C. Petersen

Attorneys for Defendant

EXPORT INTERNATIONAL, INC.

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PURSUANT TO STIPULATION, IT IS SO ORDERED

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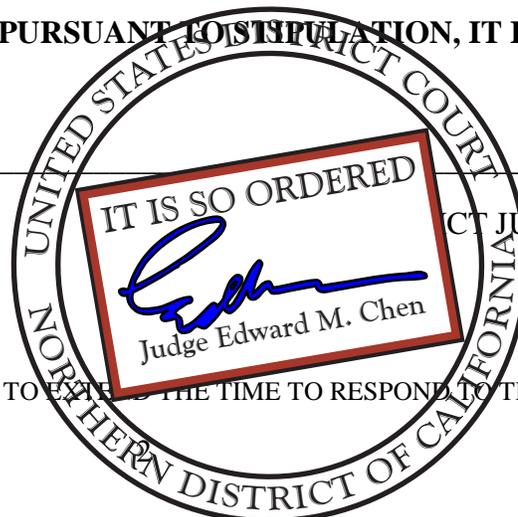
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Dated: 1/24/13

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SECOND STIPULATED MOTION TO EXTEND THE TIME TO RESPOND TO THE COMPLAINT

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