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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

**SECOND 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 One previous modification to the Case Management Schedule has been requested and  
 23 granted. The parties have also concurrently filed a Second Stipulated Request to Further Extend  
 24 the Time to Respond to Complaint.

25 This second requested enlargement of time/ relief from the Case Management Schedule is  
 26 sought to allow APL and EI time to finalize a settlement agreement. The parties have agreed on

SECOND STIPULATED REQUEST FOR ORDER GRANTING RELIEF FROM CASE MANAGEMENT  
 SCHEDULE

1 the amount of a settlement payment from EI to APL. However, a term of the proposed  
 2 settlement involves APL entering into a shipping contract with EI. An enlargement of the time  
 3 for the Case Management Schedule will allow the parties to negotiate the terms of that contract  
 4 and complete the settlement. (See Declaration of Mark K. de Langis, filed in support of this  
 5 Second Stipulated Request.)

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

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9 Date	Event	Governing Rule
10 2/1/2013	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
11 2/1/2013	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)
12 2/1/2013 13	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)
14 <del>2/14/2013</del> 15 2/28/13	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
16 <del>2/21/2013</del> 17 3/7/13	Case Management Conference in Courtroom 5, 17 <sup>th</sup> Floor, SF at 9:00 a.m.	Civil L.R. 16-10

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18 DATED: January 17, 2013

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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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1 DATED: January 17, 2013

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

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

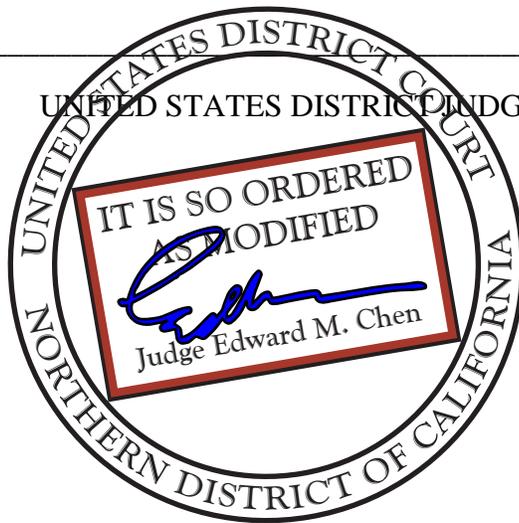
**PURSUANT TO STIPULATION, IT IS SO ORDERED**

The CMC is reset to 3/7/13 at 9:00 a.m. A joint CMC Statement shall be filed by 2/28/13.  
1/24/13

Dated: \_\_\_\_\_

\_\_\_\_\_

UNITED STATES DISTRICT JUDGE



**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