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Attorneys for Plaintiff

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 STATE FARM AUTOMOBILE)
20 INSURANCE COMPANY,)
21 Plaintiff,)
22 v.)
23 UNITED STATES OF AMERICA,)
24 Defendant.)

No. C 12-04678 MEJ

**STIPULATION EXTENDING TIME
FOR DEFENDANT TO RESPOND TO
COMPLAINT AND CONTINUING
INITIAL CASE MANAGEMENT
CONFERENCE AND ~~PROPOSED~~
ORDER**

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STIPULATION EXTENDING TIME
Case No. C 12-04678 MEJ

1 Pursuant to Northern District Civil Local Rules 6-1(a), 7-12, and 16-2(d), Plaintiff State
2 Farm Mutual Automobile Insurance Company and Defendant United States of America hereby
3 submit the following stipulation and proposed order extending the time for Defendant to respond
4 to the Complaint and continuing the Initial Case Management Conference in this action.

5 *****

6 WHEREAS, on September 7, 2012, Plaintiff filed this subrogation action seeking
7 \$5000.98 in damages in connection with an insurance claim that was paid by Plaintiff to a
8 policyholder involved in a motor vehicle accident with an individual allegedly acting at the time
9 within the course and scope of his employment by the United States Mint;

10 WHEREAS, Plaintiff served the United States Attorney's Office with a copy of the
11 summons and complaint in this action on or around September 27, 2012;

12 WHEREAS, the Order Setting Initial Case Management Conference and ADR Deadlines
13 in this action, see Dkt. No. 3, set a deadline of November 29, 2012, for the parties to submit a
14 Case Management Statement, and further set an initial case management conference for
15 December 6, 2012;

16 WHEREAS, Defendant has not yet responded to the Complaint in this action and,
17 without waiving any arguments that Defendant may have regarding defects of service in this
18 action, the deadline for Defendant to respond to the Complaint in this action is still not until
19 November 26, 2012;

20 WHEREAS, in light of the amount in controversy in this action, the parties have already
21 initiated good-faith discussions regarding the settlement of the claims presented in this action
22 and intend to continue such negotiations forthwith and to voluntarily exchange information
23 regarding the subject matter of this lawsuit in order to resolve the dispute, if possible, without
24 further litigation or need for Court intervention;

25 NOW, THEREFORE, it is hereby agreed by Plaintiff and Defendant that (1) Defendant's
26 deadline to respond to the Complaint in this action shall be extended by forty-five (45) days until
27 and including Monday, January 14, 2013; and (2) the Initial Case Management Conference set in
28 this action shall be continued until February 7, 2013, at 10:00 a.m. and all other deadlines set by

1 the Court in its Order Setting Initial Case Management Conference shall be continued by the
2 same interval, such that the parties' Case Management Statement(s) shall be due on or before
3 January 31, 2013, and the meet-and-confer deadlines set in the Court's order shall be January 17,
4 2013.

5 IT IS SO STIPULATED.

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8 DATED: November 26, 2012

Respectfully submitted,

MELINDA HAAG
United States Attorney

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13 DATED: November 26, 2012

/s/ Mark R. Conrad
MARK R. CONRAD
Assistant United States Attorney
Attorneys for Defendant

REESE LAW GROUP
Joseph M. Pleasant

/s/ Joseph M. Pleasant
JOSEPH M. PLEASANT
Attorneys for Plaintiff

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~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties, the Court hereby ORDERS that the deadline for Defendant to respond to the Complaint in this action shall be extended by forty-five (45) days until and including Monday, January 14, 2013; and further ORDERS that the Initial Case Management Conference in this matter set for December 6, 2013, is hereby VACATED and CONTINUED until February 7, 2013, at 10:00 a.m. The parties shall file a Joint Case Management Statement not later than January 31, 2013.

PURSUANT TO STIPULATION, IT IS SO ORDERED.



Dated: November 27, 2012

HONORABLE MARIA-ELENA JAMES
Chief Magistrate Judge