

1 MELINDA HAAG (CABN 132612)
United States Attorney

2 ALEX G. TSE (CSBN 152348)
3 Chief, Civil Division

4 MARK R. CONRAD (CSBN 255667)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7025
8 Fax: (415) 436-6748
9 Email: mark.conrad@usdoj.gov

Attorneys for Defendants

10 REESE LAW GROUP
11 Joseph M. Pleasant (CSBN179571)
12 6725 Mesa Ridge Road, Suite 240
13 San Diego, CA 92121
14 Telephone: (858) 550-0389
15 Fax: (858) 550-0941
16 Email: jpleasant@reeselawgroup.com

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.

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6 WHEREAS, on September 7, 2012, Plaintiff filed this subrogation action seeking
7 \$5,000.98 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, on January 11, 2013, the parties filed a Stipulation for Compromise
11 Settlement and Release (“Settlement Agreement”), which would resolve all claims asserted in
12 this action, *see* Dkt. No. 7;

13 WHEREAS, the Settlement Agreement contemplates the entry of a Stipulation of
14 Dismissal with Prejudice upon payment by Defendant of the Settlement Amount described
15 therein, *see id.* ¶¶ 3, 5 & Ex. A;

16 NOW, THEREFORE, to provide the parties with additional time to fulfill the obligations
17 undertaken by them under the Settlement Agreement, such that the above-referenced stipulation
18 of dismissal may be entered without need for further proceedings before this Court, it is hereby
19 agreed by Plaintiff and Defendant that:

20 (1) Defendant’s deadline to respond to the Complaint in this action shall be extended by
21 one-hundred-and-twenty (120) days, until and including Tuesday, May 14, 2013; and

22 (2) the Initial Case Management Conference set in this action shall be continued until
23 May 30, 2013, at 10:00 a.m. and all other deadlines set by the Court in its Order Setting Initial
24 Case Management Conference shall be continued by the same interval, such that the parties’

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1 Case Management Statement(s) shall be due on or before May 23, 2013, and the meet-and-
2 confer deadlines set in the Court's order shall be May 9, 2013.

3 IT IS SO STIPULATED.

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Respectfully submitted,

6 DATED: January 11, 2013

MELINDA HAAG
United States Attorney

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

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11 DATED: January 11, 2013

REESE LAW GROUP
Joseph M. Pleasant

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/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 until and including May 14, 2013; and further ORDERS that the Initial Case Management Conference in this matter set for February 7, 2013, is hereby VACATED and CONTINUED until May 30, 2013, at 10:00 a.m. The parties shall file a Joint Case Management Statement not later than May 23, 2013.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 14, 2013



HONORABLE MARIA-ELENA JAMES
Chief Magistrate Judge