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 9 Attorney for Plaintiff
 10 GREENMARC, LLC
 11 Mark Green, Manager Member

12
 13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 GREENMARC, LLC,) CASE NO. C 12-6490 SI
 16 Mark Green, Manager Member,)

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 26)
 27)
 28)

Plaintiff,

v.

JOSEPH B. IFFLA, *et al.* ,

Defendants.

**STIPULATION RE: EXTENSION OF
 TIME FOR RESPONSE TO
 COMPLAINT AND OTHER PRE-
 CMC DEADLINES**

The undersigned parties ("Parties"), by and through their attorneys, hereby stipulate as follows:

1. The Parties, in addition to their meet and confer obligations, have engaged in informal settlement discussions and document exchange. A technical report documenting assessment of environmental conditions and remedy alternatives with regard to the subject property at 1007 and 1011 Bransten Road in San Carlos, California is imminent, and will provide a foundation for further settlement discussions, cost allocation, and formulation of a case discovery plan. In order to afford the Parties proper time to evaluate and discuss the forthcoming report and in the interest of judicial economy, the Parties agree that continuance of various case deadlines is in the interests

1 of the Parties and the Court. The Parties believe that such considerations are more properly made
2 prior to an initial case management conference ("CMC").

3 2. Accordingly, the Parties agree to the following extensions of upcoming Court
4 deadlines:

5
6 A. the initial CMC currently scheduled for May 10, 2013 shall be extended to June
7 28, 2013, at 2:30 p.m. in Courtroom No. 10 on the Nineteenth Floor of the Federal Building;

8 B. the time to answer or otherwise respond to the Complaint (ECF No. 1) shall be
9 extended from May 28, 2013 to July 17, 2013;

10 C. the last day to file the Rule 26(f) Report, complete initial disclosures (except as
11 set forth in paragraph 2.D. below) and/or state objection in a Rule 26(f) Report and file the first
12 Case Management Statement shall be extended from May 3, 2013 to June 21, 2013; and

13 D. the last day to complete initial disclosures on those subjects agreed by the parties,
14 during their meet and confer conference on April 18, 2013, to be useful to continued settlement
15 discussions, shall be extended from May 3, 2013 to May 22, 2013.

16 3. The terms of the Case Management Conference Order filed February 28, 2013 (ECF
17 No. 10) and the Stipulation filed on March 27, 2013 (ECF No. 12) will otherwise remain in effect.

18
19 IT IS SO STIPULATED.

20
21 Dated: 5/1/2013

LAW OFFICES OF KARL R. MORTHOLE

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24 Karl R. Morthole, Attorney for
25 Plaintiff GREENMARC, LLC

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Dated: 5/1/2013

BARG COFFIN LEWIS & TRAPP LLP

Joshua A. Bloom ^{KRM}
(by permission)

Joshua A. Bloom, Attorney for Defendant
CARL R. HEINEMANN, individually

Dated: _____

HARRELSON & ASSOCIATES

(S/sum page)

Thomas M. Harrelson, Attorney for
Defendants JOSEPH B. IFFLA, individually
and dba PERFORMEX MACHINING
COMPANY, and PERFORMEX
MACHINING, INC.

Dated: 5/1/2013

PIERCE & SHEARER LLP

by Stacy Y. North ^{KRM}
(by permission)

Stacy Y. North, Attorney for Defendants
HOFFMAN METAL PRODUCTS, INC.,
and HARRY W. HOFFMAN, individually
and as an officer, director and owner of
HOFFMAN METAL PRODUCTS

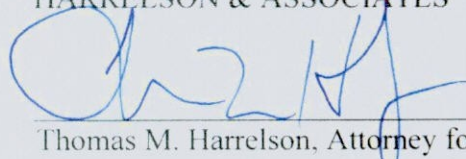
Dated: _____

BARG COFFIN LEWIS & TRAPP LLP

Joshua A. Bloom, Attorney for Defendant
CARL R. HEINEMANN, individually

Dated: 4/30/2013

HARRELSON & ASSOCIATES



Thomas M. Harrelson, Attorney for
Defendants JOSEPH B. IFFLA, individually
and dba PERFORMEX MACHINING
COMPANY, and PERFORMEX
MACHINING, INC.

Dated: _____

PIERCE & SHEARER LLP

by _____
Stacy Y. North, Attorney for Defendants
HOFFMAN METAL PRODUCTS, INC.,
and HARRY W. HOFFMAN, individually
and as an officer, director and owner of
HOFFMAN METAL PRODUCTS

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IT IS SO ORDERED.

Dated: 5/2/13



Hon. Susan Illston,
UNITED STATES DISTRICT JUDGE

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9 Attorney for Plaintiff
10 GREENMARC, LLC
11 Mark Green, Manager Member

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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 GREENMARC, LLC,) CASE NO. C 12-6490 SI
16 Mark Green, Manager Member,)
17)
18 Plaintiff,)
19) CERTIFICATE OF SERVICE
20 v.)
21)
22 JOSEPH B. IFFLA, et al.,)
23)
24 Defendants.)
25 _____)

26 I declare that on the date set forth below, I served the following document:

27 **1. STIPULATION RE: EXTENSION OF TIME FOR RESPONSE TO**
28 **COMPLAINT AND OTHER PRE-CMC DEADLINES**

on two Defendants listed below, whom I served by regular U.S. Mail, postage pre-paid, at the following addresses, c/o counsel, and to whom notice was electronically mailed, to:

Joseph B. Iffla, individually and dba Performex Machining Company, and as registered agent of Performex Machining, Inc., 963 Terminal Way San Carlos, CA 94070, c/o Thomas M. Harrelson, Esq., Harrelson & Associates, 533 Airport Blvd Ste 325, Burlingame, CA 94010, tharrelson@harrelsonlaw.com, authorized to accept service; and

Hoffman Metal Products, Inc. and Harry W. Hoffman, individually and as an officer, director and owner of Hoffman Metal Products, Inc., 1011C Bransten Road, San Carlos, CA 94070, c/o Stacey Y. North, Esq., PIERCE & SHEARER LLP, 2200 Geng Road, Suite 230, Palo Alto, CA 94303, stacy@pierceshearer.com, authorized to accept service;

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And on one Defendant listed below, whom I served by E-Filing through the Northern District ECF site, c/o counsel, and to whom notice was electronically mailed, to:

Carl R. Heineman, individually, 1515 El Verano Way, Belmont, CA 94002, c/o Joshua A. Bloom, Esq., at jab@bcctlaw.com, jff@bcctlaw.com, and Sherry E. Jackman, Esq., at sej@bcctlaw.com, fmc@bcctlaw.com, Barg Coffin Lewis & Trapp, LLP, 350 California Street, 22nd Floor, San Francisco, CA 94104-1435, authorized to accept service.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on the date hereinafter set forth.

San Francisco, CA
Date: May 1, 2013

/s/ Karl R. Morthole

Karl R. Morthole