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5 Attorneys for Defendant Joseph B. Iffla,
 Performex Machining Co., & Performex Machining, Inc.

6 UNITED STATES DISTRICT COURT
 7 NORTHERN DISTRICT OF CALIFORNIA

9 GREENMARC, LLC, et al.

10 Plaintiffs,

11 v.

12 JOSEPH B. IFFLA, ET AL., et al.;

13 Defendants.

Case No.: C 12-6490 WHO

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

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

18 1. The Parties submit this proposed Stipulation in lieu of an additional Joint Case
 19 Management Statement as required by the Reassignment Order and Order Requiring
 20 Submission of Case Management Statement;

21 2. The Parties, in addition to their meet and confer obligations, have engaged in
 22 informal settlement discussions and document exchange. A technical report documenting
 23 assessment of environmental conditions and remedy alternatives with regard to the subject
 24 property at 1007 and 1011 Bransten Road in San Carlos, California has been circulated by
 25 Plaintiff and has provided the foundation for further settlement discussions, cost allocation,
 26 and formulation of a case discovery plan. In addition, the Parties have agreed to an early
 27 neutral evaluation through the District Court's ADR program and are awaiting the selection
 28 of an evaluator that has not conflicts with any of the Parties hereto. The Parties have

1 tentatively agreed to solicit communications with the San Mateo County Health Department
2 in which Plaintiff has voluntarily been participating in monitoring activities to determine
3 whether the County will require further remediation and if so, in what form it may take.

4 In order to afford the Parties additional time to continue to evaluate and discuss their
5 settlement options and in the interest of judicial economy, the Parties agree that continuance
6 of various case deadlines are in the interests of the Parties and the Court. The Parties believe
7 that such considerations are more properly made prior to an initial case management
8 conference ("CMC").

9 3. Accordingly, the Parties agree to the following extensions of upcoming Court
10 deadlines:

11 A. An the initial CMC was scheduled for June 28, 2013, at 2:30 p.m. before the
12 Honorable Susan Illston in Courtroom No. 10 on the Nineteenth Floor of the Federal
13 Building. That CMC never took place due to the reassignment of the matter to Judge Orrick.
14 Now that this case has been reassigned to Judge William H. Orrick, the Parties respectfully
15 request the scheduling of an initial CMC before Judge Orrick for late September or October,
16 2013 and subject to the calendar availability of Judge Orrick. This extension also considers
17 the vacation schedules of counsel;

18 B The time to answer or otherwise respond to the Complaint (ECF No.1) shall
19 be further extended from the current agreed upon date of July 17, 2013 to September 25,
20 2013;

21 C. The Parties have previously submitted and filed the Rule 26(f) Report, have
22 completed their initial disclosures, and filed their initial Case Management Statement. The
23 Parties agree to provide a joint supplemental Rule 26(f) Report and a supplemental joint Case
24 Management Report after the Parties have continued their settlement discussions and
25 ADR/ENE session and all prior to the upcoming to be scheduled CMC before Judge Orrick.

26 D. The Parties agree to extend the ENE deadline for completion to the week of
27 October 21, 2013. The last proposed ENE neutral, Jane Pandell, Esq. was objected to by
28

1 Defendant Iffla due to a conflict arising out of a prior employment relationship between Ms.
2 Pandell's Firm and counsel for Mr. Iffla. A new ENE neutral has not yet been assigned.

3 4. The terms of the Case Management Conference Order filed February 28, 2013 (ECF
4 No. 10), the Stipulation filed on March 27, 2013 (ECF No. 12), the Stipulation filed on May
5 6, 2013 (ECF No. 27) will otherwise remain in effect.

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7 **IT IS SO STIPULATED.**

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9 Dated: _____

LAW OFFICES OF KARL R. MORTHOLE

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11 _____
Karl R. Morthole, Attorney for PLAINTIFF

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13 Dated: _____

HARRELSON & ASSOCIATES

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

18
19 Dated: _____

BARG COFFIN LEWIS & TRAPP, LLP

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21 _____
22 Joshua A. Bloom, Attorney for Defendant
CARL R. HEINEMAN, individually

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24 Dated: _____

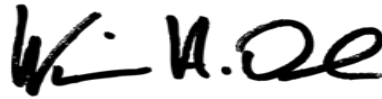
PIERCE & SHEARER LLP

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

1 IT IS SO ORDERED.

2 The Case Management Conference is set for 10/29/2013 02:00 PM in Courtroom 2,
3 17th Floor, San Francisco.

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6
7 Dated: July 19, 2013



8
9 Hon. William H. Orrick
10 UNITED STATES DISTRICT JUDGE