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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE, a non-profit
corporation,

Plaintiff,

vs.

CRITERION CATALYSTS &
TECHNOLOGIES, L.P., a corporation,

Defendant.

Case No. 3:13-cv-01260-JSC

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND DEADLINE FOR
RESPONSIVE PLEADING AND
RESCHEDULE CASE MANAGEMENT
CONFERENCE**

Judge: Hon. Jacqueline S. Corley

Proposed Responsive Pleading: Nov. 15, 2013
Proposed CMC: Dec. 5, 2013

WHEREAS, on June 12, 2013, Plaintiff California Sportfishing Protection Alliance (“CSPA”) and Defendant Criterion Catalysts & Technologies, L.P. (“Criterion”) (collectively, “Parties”) first entered into a stipulation acknowledging that the deadline for Criterion to file a responsive pleading was extended to August 6, 2013 and requesting that the initial Case Management Conference be rescheduled to August 22, 2013 (“June 12 Stipulation”) (ECF Dkt. 7), to permit the Parties to engage in confidential settlement discussions that would resolve this matter outside of litigation. On June 12, 2013, the Court entered an order approving the June 12 Stipulation (ECF Dkt. 8).

WHEREAS, on July 26, 2013, the Parties entered into a second stipulation requesting that the deadline for Criterion to file a responsive pleading be further extended to October 1, 2013 and requesting that the initial Case Management Conference be rescheduled to October 17, 2013 (“July

STIPULATION TO EXTEND DEADLINE FOR RESPONSIVE;
PLEADING AND RESCHEDULE CMC;
[PROPOSED} ORDER

1 26 Stipulation") (ECF Dkt.10), to permit the Parties to continue to engage in confidential settlement
2 discussions that would resolve this matter outside of litigation. On July 29, 2013, the Court entered
3 an order approving the July 26 Stipulation (ECF Dkt. 11).

4 WHEREAS, since the June 12 Stipulation and the July 26 Stipulation, the Parties have been
5 diligently engaged in confidential settlement discussions, which are still continuing and require
6 additional time for the Parties to fully pursue, and are in the process of evaluating proposed
7 settlement terms.

8 WHEREAS, the Parties believe that further short continuances of the deadline for Criterion's
9 responsive pleading and the initial Case Management Conference are necessary for the Parties to
10 continue focusing on these discussions, to avoid diverting resources away from these discussions
11 towards premature litigation, and to prevent the unnecessary expenditure of Court resources at this
12 stage.

13 WHEREAS, the Parties have agreed, upon the Court's approval, to extend the time within
14 which Criterion shall respond to the Complaint from October 1, 2013 to November 15, 2013, and to
15 reschedule the Case Management Conference from October 17, 2013 to December 5, 2013.

16 WHEREAS, no Parties would be prejudiced by the proposed continuances.

17 THEREFORE, IT IS STIPULATED by and between the Parties, through their respective
18 counsel, as follows:

- 19 1. Criterion's deadline for responding to the Complaint shall be extended from October
20 1, 2013 to November 15, 2013.
- 21 2. The deadline to file the Joint Case Management Statement shall be extended from
22 October 10, 2013 to November 25, 2013.
- 23 3. The Case Management Conference shall be continued from 1:30 p.m. on October 17,
24 2013 to 1:30 p.m. on December 5, 2013.

25 Dated: September 19, 2013

26 By: /s/ Douglas J. Chermak

27 Douglas J. Chermak

28 Attorneys for Plaintiff

CALIFORNIA SPORTFISHING PROTECTION
ALLIANCE

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2 Dated: September 19, 2013

By: /s/ Albert Giang (as authorized on 9/19/2013)

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Albert Giang

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Attorneys for Defendant

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CRITERION CATALYSTS & TECHNOLOGIES, L.P.

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[PROPOSED] ORDER

2 Based on the foregoing stipulation, IT IS HEREBY ORDERED, ADJUDGED, and DECREED that:

4. Criterion's deadline for responding to the Complaint shall be extended from October 1, 2013 to November 15, 2013.
5. The deadline to file the Joint Case Management Statement shall be extended from October 10, 2013 to November 25, 2013.
6. The Case Management Conference shall be continued from 1:30 p.m. on October 17, 2013 to 1:30 p.m. on December 5, 2013.

10 IT IS SO ORDERED.

NORTHERN DISTRICT COURT OF CALIFORNIA

13 || Dated: September 20, 2013

The Honorable Jacqueline S. Corley
United States Magistrate Judge