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7 Attorneys for Defendant
 WELLINGTON POWER CORPORATION

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

13 ROMAN HULSEY, CHRISTINA QUINN,)
 PATRICIA ADAMS, WINIFRED THOMAS,)
 14 LINDA CREEL, AND ABRAM PERLSTEIN,)
 15 Plaintiffs,)
 16 vs.)
 17 PACIFIC GAS AND ELECTRIC)
 COMPANY, WELLINGTON ENERGY INC.,)
 18 LANDIS AND GRY.,; AND DOES 1-20,)
 INCLUSIVE,)
 19 Defendants.)

Case No. 3:13-CV-3355-EMC

**STIPULATION BETWEEN
 WELLINGTON POWER CORP. AND
 PLAINTIFFS FOR FURTHER
 EXTENSION OF THE DEADLINE FOR
 DEFENDANT TO FILE AND SERVE A
 RESPONSIVE PLEADING TO
 PLAINTFFS' FIRST AMENDED
 COMPLAINT**

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1 Defendant WELLINGTON POWER CORPORATION (“Wellington”) and Plaintiffs
2 ROMAN HULSEY, CHRISTINA QUINN, PATRICIA ADAMS, WINIFRED THOMAS,
3 LINDA CREEL, and ABRAM PERLSTEIN (“Plaintiffs”), by and through their respective
4 counsel, stipulate as follows:

5 **RECITALS**

- 6 1. On June 7, 2013, Plaintiffs filed their First Amended Complaint (“FAC”) in the San
7 Francisco Superior Court of the State of California (Case No. CGC-13-531837) (the
8 “state court action”). Wellington is named as a defendant in the state court action.
- 9 2. On July 18, 2013, Defendant PACIFIC GAS AND ELECTRIC COMPANY filed with
10 this Court a notice of removal of Plaintiffs’ state court action.
- 11 3. At the time the notice of removal was filed, Wellington had not yet appeared in the state
12 court action and, consequently, was not served with the notice. Counsel for Wellington
13 did not learn a notice of removal had been filed until July 26, 2013.
- 14 4. Upon learning of the notice of removal, Wellington’s counsel immediately contacted
15 Plaintiffs’ counsel to confirm that the previous agreement the parties reached in the state
16 court action to extend Wellington’s deadline to file and serve a responsive pleading until
17 August 14, 2013, would be honored in this federal proceeding.
- 18 5. Plaintiffs’ counsel agreed to give Wellington until August 14, 2013, to file and serve a
19 responsive pleading in this above-captioned matter.
- 20 6. On August 13, 2013, in light of the breadth of the factual and legal issues raised in the
21 FAC, Wellington’s counsel contacted Plaintiffs’ counsel to request to further extend the
22 deadline to file and serve a responsive pleading and/or motion in this above-captioned
23 matter until August 19, 2013.
- 24 7. Plaintiffs’ counsel agreed to extend the deadline to file and serve a responsive pleading
25 and/or motion until August 19, 2013.
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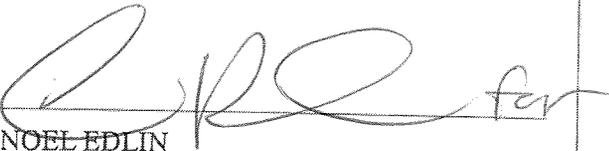
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STIPULATION

1. Plaintiffs and Wellington hereby stipulate that Wellington has until August 19, 2013, to file and serve a responsive pleading and/or motion in the above-captioned matter.

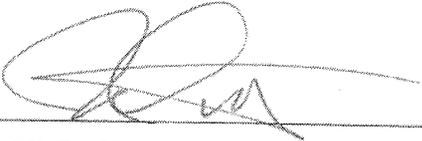
Date: August 13, 2013

BASSI, EDLIN, HUIE & BLUM LLP

By: 
NOEL EDLIN
Attorneys for Defendant
WELLINGTON POWER CORPORATION

Date: August 13, 2013

LAW OFFICES OF PAUL R. OVERETT

By: 
PAUL R. OVERETT
Attorneys for Plaintiffs

IT IS SO ORDERED.

Dated: 8/14/13



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1 **Re: Roman Hulsey, et al. v. Pacific Gas & Electric Company, et al.**
2 **United States District Court, Northern District Case No. 3:13-CV-3355-EMC**

3 **CERTIFICATE OF SERVICE – ELECTRONIC TRANSMISSION**

4 STATE OF CALIFORNIA/COUNTY OF San Francisco

5 I am a citizen of the United States and an employee in the County of San Francisco. I
6 am over the age of eighteen (18) years and not a party to the within action. My business
7 address is BASSI, EDLIN, HUIE & BLUM LLP, 500 Washington Street, Suite 700, San
8 Francisco, California 94111.

9 On the date executed below, I electronically served the document(s) via ECF File &
10 Serve for USDC Northern District of California, described below, on the recipients designated
11 on the Transaction Receipt located on the ECF File & USDC Northern District of California
12 website.

13 **STIPULATION BETWEEN WELLINGTON POWER CORP. AND**
14 **PLAINTIFFS FOR FURTHER EXTENSION OF THE DEADLINE FOR DEFENDANT**
15 **TO FILE AND SERVE A RESPONSIVE PLEADING TO PLAINTFFS' FIRST**
16 **AMENDED COMPLAINT**

17 On the following parties:

18 PLEASE SEE SERVICE LIST PROVIDED ON THE ECF WEBSITE

19 X **BY ELECTRONIC FILING:** I caused the above document to be served by ECF to
20 the following names on the service list provided by ECF, and;

21 I declare under penalty of perjury that the foregoing is true and correct and that this
22 document is executed on August 13, 2013, at San Francisco, California.

23 /s/ BRIDGETTE C. BURDICK

24 _____
25 BRIDGETTE C. BURDICK
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