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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROMAN HULSEY, CHRISTINA QUINN,
PATRICIA ADAMS, WINIFRED THOMAS,
LINDA CREEL, AND ABRAM PERLSTEIN,

Plaintiffs,
vs.

PACIFIC GAS AND ELECTRIC COMPANY,
WELLINGTON ENERGY INC., LANDIS AND
GYR, AND DOES 1-20, INCLUSIVE,

Defendants.

Case No.: 3:13-cv-03355-EMC

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME FOR DEFENDANT
PACIFIC GAS & ELECTRIC COMPANY
TO RESPOND TO FIRST AMENDED
COMPLAINT**

Honorable Edward M. Chen

1 Plaintiffs and Defendant Pacific Gas & Electric Company ("PG&E"), by and through their
2 respective undersigned counsel, agree as follows:

3 WHEREAS, Plaintiff filed their Complaint in the Superior Court of the State of California,
4 City and County of San Francisco on May 31, 2013;

5 WHEREAS, Plaintiffs filed their First Amended Complaint ("FAC") in the Superior Court of
6 the State of California, City and County of San Francisco on June 7, 2013;

7 WHEREAS, Defendant PG&E filed a timely Notice of Removal of the case to the Northern
8 District of California on July 18, 2013;

9 WHEREAS, Plaintiffs and PG&E agreed that Plaintiffs would serve counsel for PG&E with a
10 Notice and Acknowledgement of Receipt of the FAC;

11 WHEREAS, Plaintiffs served that Notice and Acknowledgement of Receipt on August 7,
12 2013;

13 WHEREAS, counsel for PG&E signed the Notice and Acknowledgement of Receipt on
14 August 8, 2013;

15 WHEREAS, Plaintiffs and PG&E further agreed that PG&E would have until September 20,
16 2013 to answer or otherwise respond to the FAC;

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NOW THEREFORE, IT IS HEREBY STIPULATED, by and between Plaintiffs and PG&E, through their respective counsel, and subject to Court approval, that PG&E shall have until September 20, 2013 to answer or respond to the FAC.

DATED: August 9, 2013

Respectfully submitted,

LIM, RUGER & KIM, LLP

Philip J. Wang

Attorneys for Defendant Pacific Gas & Electric Company

By: Paul R. O'Connor

Paul R. Overett

*Attorneys for Plaintiffs Hulsey, Quinn,
Adams, Thomas, Creel and Perlstein*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
2
3 DATED: _____

8/14/13

