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Clarissa A. Kang, SBN 210660 Sean T. Strauss, SBN 245811 TRUCKER **→** HUSS A Professional Corporation One Embarcadero Center, 12th Floor 3 San Francisco, California 94111 (415) 788-3111 Telephone: 4 Facsimile: (415) 421-2017 5 Attorneys for Plaintiff 6 BOARD OF TRUSTEES OF THE KEN LUSBY CLERKS & LUMBER 7 HANDLERS PENSION FUND 8 Richard N. Hill, SBN 083629 Aleksandr Katsnelson, SBN 299309 9 LITTLER MENDELSON, P.C. 650 California Street, 20th Floor 10 San Francisco, California 94108 Telephone: (415) 439-6210 11 Facsimile: (415) 399-8490 12 Attorneys for Defendant WENDY M. OLIVER, an individual; 13 and WENDY M. OLIVER, as Trustee to the Oliver Family Trust 14

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

BOARD OF TRUSTEES OF THE KEN LUSBY CLERKS & LUMBER HANDLERS PENSION FUND,

Plaintiff,

VS.

PIEDMONT LUMBER & MILL COMPANY; WILLIAM C. MYER, JR., an individual; WENDY M. OLIVER, an individual; WENDY M. OLIVER, as Trustee to the Oliver Family Trust; and DOES 1-20,

Defendants.

Case No.: 3:13-cv-03898- HSG

NOTICE OF BANKRUPTCY STAY; STIPULATION AND ORDER EXTENDING DEADLINE FOR PLAINTIFF TO FILE MOTION FOR REIMBURSEMENT OF ITS REASONABLE ATTORNEY'S FEES AND COSTS

NOTICE OF BANKRUPTCY STAY; STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE FOR PLAINTIFF TO FILE MOTION FOR ATTORNEY'S FEES AND COSTS, Case No. 3:13-cv-03898-HSG 153388.v2

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WHEREAS, on September 17, 2015, Defendant William C. Myer, Jr. ("Myer") filed a voluntary petition under Chapter 7 of the United States Bankruptcy Code. A true and correct copy of Myer's bankruptcy petition is attached hereto as Exhibit A;

WHEREAS, as a result of the filing of Myer's bankruptcy petition, this case is stayed as to Myer pending further order of the Bankruptcy Court;

WHEREAS, pursuant to 11 U.S.C. § 362, Plaintiff Board of Trustees of the Ken Lusby Clerks & Lumber Handlers Pension Trust Fund (the "Board") is prohibited from filing its Motion for Reimbursement of its Reasonable Attorney's Fees and Costs against Myer until after obtaining an order from the Bankruptcy Court lifting the automatic stay;

WHEREAS, the Court has set a deadline of October 7, 2015 as the last day for the Board to submit its Motion for Reimbursement of its Reasonable Attorney's Fees and Costs;

WHEREAS, in the interests of judicial economy, counsel are in favor of delaying the October 7, 2015 deadline to provide the Board with sufficient time to obtain relief from the automatic stay, so that it is able to file a single Motion for Reimbursement of its Reasonable Attorney's Fees and Costs as against all Defendants, rather than separate motions as to various Defendants:

IT IS THEREFORE STIPULATED AND AGREED, by the Board and Defendant Wendy M. Oliver, by and through their respective counsel, that the Court is respectfully requested to order that:

1. The Board's deadline for submission of its Motion for Reimbursement of its Reasonable Attorney's Fees and Costs be extended by six weeks, to November 18, 2015.

DATED: September 24, 2015

TRUCKER **→** HUSS

/s/ Sean T. Strauss Clarissa A. Kang Sean T. Strauss Attorneys for Plaintiff **BOARD OF TRUSTEES OF THE** KEN LUSBY CLERKS & LUMBER HANDLERS PENSION FUND

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Trucker + Huss A Professional Corporation One Embarcadero Center, 12th Floor San Francisco, California 94111

ORDER

Pursuant to the foregoing stipulation and request, IT IS HEREBY ORDERED:

Plaintiff Board of Trustees of the Ken Lusby Clerks & Lumber Handlers Pension Trust Fund's Motion
for Reimbursement of its Reasonable Attorney's Fees and Costs shall be filed on or before November
18, 2015.

Dated: September 29, 2015

HON. HAYWOOD S. GILLIAM, JR. Judge, United States District Court Northern District of California