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 10 KATRINA RAPP

11 UNITED STATES DISTRICT COURT
 12
 13 NORTHERN DISTRICT OF CALIFORNIA

14 TITAN INDEMNITY COMPANY, a Texas
 15 corporation,

16 Plaintiff,

17 vs.

18 A PLUS TOWING, a General Partnership;
 19 JOSE HERMOSILLO, individually and dba A
 20 PLUS TOWING; FERNANDO
 21 HERMOSILLO, individually and dba A PLUS
 22 TOWING; A PLUS TOWING, a business
 23 organization form unknown, and KATRINA
 24 RAPP, an individual, and DOES 1-10,

25 Defendants.

CASE NO.: C 14-03864 WHA

**STIPULATION TO CONTINUE HEARING
 DATE OF PLAINTIFF TITAN INDEMNITY
 COMPANY'S MOTION FOR SUMMARY
 JUDGMENT AND [~~PROPOSED~~] ORDER**

Date: September 3, 2015
 Time: 8:00 a.m.
 Judge: Hon. William Alsup
 Dept.: Courtroom 8, 19th Floor

Complaint Filed: August 26, 2014

1 Plaintiff Titan Indemnity Company (“Titan”) and Defendant Katrina Rapp, (“Defendant
2 Rapp”) hereby stipulates as follows:

3 1. The hearing on Titan’s Motion for Summary Judgment is currently schedule for
4 September 3, 2015 at 8:00 a.m.

5 2. On July 30, 2015, Titan filed its Notice of Motion and Motion for Summary
6 Judgment.

7 3. On July 31, 2015, Defendant Rapp promptly contacted Titan and asked if Titan
8 would be willing to continue the hearing in order to extend Defendant Rapp’s response presently
9 due on August 13, 2015. Defendant Rapp’s counsel is schedule to leave on a long planned family
10 vacation on August 7, 2015 and will not be returning to the office until August 24, 2015.

11 4. On August 3, 2015, Titan agreed to continue the hearing until September 17, 2015.

12 5. In light of the foregoing, the parties respectfully request that the hearing on the
13 Motion for Summary Judgment be continued to September 17, 2015 at 8:00 a.m. and that all
14 associated deadlines be continued accordingly.

15 IT IS SO STIPULATED.

16 DATED: August 5, 2015

Respectfully submitted,

17 KRANKEMANN | PETERSEN LLP

18
19 By: /s/ Martin Reilley

20 MARTIN T. REILLEY
21 Attorney for Defendant
KATRINA RAPP

22 SELMAN BREITMAN LLP

23
24 By: /s/ Galina Klester Jakobson

25 GALINA KLESTER JAKOBSON
26 QUYEN THI LE
27 Attorneys for Plaintiff
TITAN INDEMNITY COMPANY

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[PROPOSED] ORDER


Pursuant to stipulation of the parties, and good cause appearing therefore, it is hereby ordered that:

1. The date for Plaintiff Titan Indemnity Company's hearing on the Motion for Summary Judgment has been continued from September 3, 2015 to September 17, 2015 at 8:00 a.m.

2. ~~All deadlines associated with the Motion shall be continued accordingly.~~

IT IS SO ORDERED. Plaintiff's opposition is now due on August 27, 2015. Defendant's reply is due on September 3, 2015.

Dated: August 11, 2015.



Hon. William Alsup
United States District Judge