

1 BRODSKY MICKLOW BULL & WEISS LLP
 Edward M. Bull III, State Bar No. 141966
 2 Kurt Micklow, State Bar No. 113974
 1070 Marina Village Parkway, Suite 200
 3 Alameda CA 94501
 Telephone: (510) 268-6180
 4 Facsimile: (510) 268-6181
 5 Attorneys for Plaintiff
 CURTIS McCAMY
 6
 7

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10

11	CURTIS McCAMY,)	CASE NO. C-15-00250 MEJ
12)	
	Plaintiff,)	
13	vs.)	REQUEST FOR CONTINUANCE OF
)	INITIAL CASE MANAGEMENT
14	MATSON NAVIGATION COMPANY)	CONFERENCE AND PROPOSED
15	and DOES 1-5, <i>in personam</i> , and S/S)	<u>ORDER THEREON</u>
16	LURLINE, her engines, tackle, apparel,)	
	furniture, and appurtenances, <i>in rem</i> ;)	
17)	
	Defendants.)	

18
 19 Plaintiff CURTIS McCAMY (“Plaintiff”) hereby submits his Request for
 20 Continuance of Initial Case Management Conference and Proposed Order Thereon as
 21 follows:

22 **RECITALS AND MOTION**

23 WHEREAS Plaintiff is a merchant seaman and has, since his accident aboard the
 24 vessel operated by Defendant Matson Navigation Company (“Matson”), returned to work,
 25 including aboard vessels operated by Matson; and
 26

27 WHEREAS Plaintiff and Matson were in the process of discussing settlement prior
 28 to the filing of the present action, but were not able to resolve Plaintiff’s claim prior to the

1 running of the statute of limitation, thus necessitating the filing of the present action; and

2 WHEREAS Counsel for Plaintiff and in-house claims representatives for Matson
3 are continuing settlement discussions and it is hoped that the matter will be resolved
4 without the need to serve the complaint (which will require Matson to retain counsel); and

5 WHEREAS Plaintiff believes that the case has a very good chance of being
6 resolved within the next thirty (30) days; and

7 WHEREAS Plaintiff will serve the summons and complaint (and related orders) if
8 the claim is not resolved within twenty-one (21) days; and

9 WHEREAS the current deadline for the filing of a Joint Case Management
10 Statement (and Rule 26(f) Report) is April 16, 2015; and

11 WHEREAS the Initial Case Management Conference is currently set on April 23,
12 2015:

13
14 **WHEREFORE** Plaintiff respectfully requests that the filing of the Joint Case
15 Management Statement (and Rule 26(f) Report) and the Initial Case Management
16 Conference, be continued for forty-five (45) days.

17 DATED: April 15, 2015

Respectfully submitted,

18
19 BRODSKY MICKLOW BULL & WEISS LLP

20
21 By: /S/ Edward M. Bull III
Edward M. Bull III

22 Attorneys for Plaintiff
23 CURTIS McCAMY
24
25
26
27
28

~~PROPOSED~~ ORDER


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Having reviewed the Request for Continuance of Initial Case Management Conference and Proposed Order Thereon, and finding that good cause exists to grant the relief requested, IT IS HEREBY ORDERED THAT:

The current Initial Case Management Conference date is hereby VACATED and reset for June 25, 2015.

A Joint Case Management Statement (and Rule 26(f) Report) are to be filed no later than June 18, 2015.

DATED: April 16, 2015

By: 
Hon. Maria-Elena James
Magistrate Judge