GERALD C. STERNS (State Bar No. 029976) STERNS & WALKER 825 Washington Street, Suite 305 Oakland, CA 94607 Telephone: (510) 267-0500 Facsimile: (510) 267-0506 3 4 Email: sterns@trial-law.com 5 Attorneys for Defendants' Broyles 6 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO COURTHOUSE 11 12 HALLMARK AMERICAN INSURANCE Case No. 3:15-cv-05536 COMPANY, a corporation, 13 STIPULATION TO RESET MOTION FOR SUMMARY JUDGMENT Plaintiff, 14 RESPONSE, REPLY AND HEARING DATES AND PROPOSED ORDER VS. 15 THEREON TOM WASSON, dba TOM'S AIRCRAFT 16 ENTERPRISES; RONALD C. BROYLES, JEAN 17 O. BROYLES, and DOES 1 through 25, inclusive, 18 Defendants. 19 20 21 Plaintiff Hallmark American Insurance has filed a Motion for Summary Judgment, now 22 set on the Court's calendar for Hearing on July 21, 2016, at 1:30 p.m. The Court set a Response 23 and Reply schedule (please see Attached) as follows: Defendants Broyles' Response due June 24 30, 2016; Plaintiff Hallmark Reply due July 7, 2016. Counsel for the Parties have met and 25 conferred and agree that in view of the issues that need to be fully briefed and addressed on 26 behalf of both sides in this Motion, this schedule does not provide adequate time. Putting all 27 dates back at least thirty (30) days should provide adequate time so that all issues may be fully 28

Stipulation to Continue Hearing on Plaintiff's Motion for Summary Judgment

addressed. The Parties therefore present this Joint Stipulation for an Order resetting the schedule as follows:

Defendants Broyles' Response will now be due on August 1, 2016; Replies will now be due on August 8, 2016.

Hearing to be reset at some date thereafter, in accordance with the Court's calendar. Counsel note that on the original setting, the Hearing was set for July 21, 2016, two weeks after due date for Plaintiff Reply. Using same timing on new setting, Counsel would anticipate the Hearing on Plaintiff's Motion for Summary Judgment would be set for some time on or after August 22, 2016.

IT IS FURTHER STIPULATED that the trial date in this matter be continued for 30 days from the date of September 26, 2016 until October 26, 2016 or as soon thereafter as the court may set.

It is so Stipulated:

Dated: 0/20/16

WORTHE, HANSON & WORTHE

BY

John R. Hanson

Attorneys for Plaintiffs

Dated: 21/mw 2016

STERNS & WALKER

BY

Gerald C. Sterns

Attorneys for Defendants Broyles

## [PROPOSED] ORDER

Good Cause Appearing Therefore, IT IS SO Ordered.

The new hearing date on Plaintiff Hallmark American Insurance Company's Motion for Summary Judgment is now set for September 1, 2016; Responses will now be due on August 1, 2016; replies due on August 8, 2016.

IT IS FURTHER ORDERED that the trial in this matter is now set for with a Pretrial Conference on December 15, 2016 at 10:00 a.m.

Dated: 6/21/16

Judge of the USDC, Northern District Of California