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 12 K.O.O. Construction, Inc. and Keith Odister

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

15 TRAVELERS CASUALTY AND
 16 SURETY COMPANY OF
 AMERICA, a Connecticut
 17 corporation,

18 Plaintiff,

19 v.

20 K.O.O. CONSTRUCTION, INC., a
 California corporation; and KEITH
 21 ODISTER, an individual, inclusive,

22 Defendants.

Case No. 316-CV-00518-JCS

**STIPULATION AND REQUEST TO
 EXTEND TIME TO FILE
 STIPULATION OR
 ADMINISTRATIVE MOTION FOR
 ENTRY OF JUDGMENT**

(Civil Local Rule 7-11)



23
 24 On November 5, 2018, this Court entered an order on the parties' stipulation
 25 that a stipulation or an administrative motion for entry of judgment would be filed
 26 by November 8, 2018. (Dkt. No. 225.) The undersigned counsel have been
 27 working on a stipulation in lieu of such an administrative motion as required by
 28

1 Civil Local Rule 7-11(a), but disagreements remain on its contents, particularly
2 with regard to prejudgment interest. While significant progress has been made in
3 closing the gap between the parties' respective positions, the parties did not reach
4 an agreement as to the language of stipulation to enter judgment as of the date of
5 the filing of this document.

6 The parties have made sincere good-faith efforts to agree upon the terms of a
7 stipulated judgment. Undersigned counsel believe that further negotiations in the
8 next week may allow the parties to come to an agreement on the total amount and
9 terms of a stipulated judgment, thus sparing the Court the burden of considering a
10 motion on entry of judgment. The parties therefore respectfully request that this
11 Court give them another week to try to agree to the terms of a stipulated judgment,
12 with the parties' stipulation or an administrative motion being filed on or before
13 November 15, 2018.

14
15 Dated: November 8, 2018

SMTD LAW LLP

17 By: /s/ Edward R. Stepan

18 Michael Timpane
19 Edward R. Stepan
20 Attorneys for Plaintiff
21 TRAVELERS CASUALTY AND
22 SURETY COMPANY OF
23 AMERICA

24
25 Dated: November 8, 2018

**REYNOLDS MADDUX
WOODWARD LLP**

26 By: /s/ Arthur G. Woodward

27 Arthur G. Woodward
28 Attorneys for
Defendants/Counterclaimants
K.O.O. CONSTRUCTION, INC.
AND KEITH ODISTER