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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 KIRLIN BUILDERS, LLC, f/k/a JOHN J.
KIRLIN SPECIAL PROJECTS, LLC,

21 Plaintiff,

22 v.

23 NORTH AMERICAN SPECIALTY
24 INSURANCE COMPANY,

25 Defendant.

26 AND RELATED CROSS-CLAIM
27

Case No. 3:17-cv-00608 JST

28 **JOINT STIPULATION AND
[PROPOSED] ORDER CONTINUING
CASE MANAGEMENT CONFERENCE
AND OTHER PENDING DEADLINES**

1 This Stipulation is entered into by and among Plaintiff Kirlin Builders, LLC ("Kirlin")
2 and Defendant/Cross-Plaintiff North American Specialty Insurance Company ("NAS")
3 (collectively "the Parties"), by and through their respective counsel;

4 WHEREAS, Kirlin filed a complaint in the above-entitled action in the United States
5 District Court for the Northern District of California, on February 7, 2017 (the "Complaint") and
6 served the Complaint on NAS on March 7, 2017;

7
8 WHEREAS, on February 23, 2017, the Clerk continued the date of the Case Management
9 Statement from May 5, 2017 to May 15, 2017 and the Initial Case Management Conference from
10 May 12, 2017 to May 24, 2017;

11 WHEREAS, NAS filed its answer to the Complaint and cross-claim (the "Cross-Claim")
12 against Cross-Defendants, Federal Solutions Group, Inc, d/b/a Federal Construction, Bara
13 Infoware, Inc., Selina Sing & Manjindar P. Singh on March 28, 2017 and served Cross-
14 Defendants on April 12, 2017;

15
16 WHEREAS, Cross-Defendants have not yet answered the Cross-Claim;

17 WHEREAS, Cross-Defendants' answer to the Cross-Claim is currently due May 3, 2017;

18 WHEREAS, on April 21, 2017, the Parties met and conferred regarding the initial
19 disclosures, early settlement, ADR process selection, and the discovery plan;

20
21 WHEREAS, a Joint Case Management Statement is currently due by May 15, 2017 and
22 the Initial Case Management Conference is set for May 24, 2017 (Dkt. No. 10);

23 WHEREAS, the Parties agree that a twenty-eight (28) day continuance of the Case
24 Management Conference and related pending deadlines is necessary so as to allow the
25 participation of Cross-Defendants, who have yet to answer the Cross-Claim;

1 WHEREAS, the Parties agree that a twenty-eight (28) day continuance of the Case
2 Management Conference and related pending deadlines will permit more efficient case
3 management, will serve the interests of judicial economy, and will conserve Party and Court
4 resources;

5 NOW, THEREFORE, pursuant to Civil Local Rules 6-2(a) and 7-12, the Parties hereby
6 stipulate and agree, through their respective counsel, as follows:
7

8 1. The May 24, 2017 Case Management Conference shall be continued by twenty-
9 eight (28) days to June 21, 2017 at 2PM, or another date thereafter that is convenient for the
10 Court.

11 2. The deadline to file the Joint Case Management Statement, Rule 26(f) Report,
12 complete initial disclosures, or state objections in Rule 26(f) Report shall be continued to and
13 including fourteen (14) days prior to the new date for the Case Management Conference.
14

15 **IT IS SO STIPULATED.**

16 Dated: April 26, 2017

By:

/s/ Laura C. Hurtado

LAURA C. HURTADO

Counsel for Plaintiff KIRLIN BUILDERS, LLC

20 Dated: 04/26/17

By:


CRAIG E. GUENTHER

*Counsel for Defendant NORTH AMERICAN
SPECIALTY INSURANCE COMPANY*

24 **~~PROPOSED~~ ORDER**

25 Pursuant to the parties' stipulation and good cause having been shown, it is hereby
26 ordered that the case management conference currently set for May 24, 2017 at 2PM is continued
27 to June 21, 2017 at 2PM. The deadline to file the Joint Case Management Statement, Rule 26(f)

28 3 of 4

1 Report, complete initial disclosures, or state objections in Rule 26(f) Report shall be continued to
2 June 7, 2017.

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4 Dated: April 27, 2017



THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

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