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21 Attorneys for Defendant & Third-Party Plaintiff
 22 United States of America

23 UNITED STATES DISTRICT COURT
 24 NORTHERN DISTRICT OF CALIFORNIA
 25 SAN FRANCISCO DIVISION

26 KARI PRESTON,) Civil No. C-07-3861-PJH
 27)
 28 Plaintiff,) IN ADMIRALTY
 29)
 30 v.)
 31)
 32 UNITED STATES OF AMERICA, BAE) STIPULATED ORDER TO
 33 SYSTEMS SF SHIP REPAIR, INC., and) EXTEND ALL DATES
 34 DOES 1 through 10, Inclusive,) AS MODIFIED BY THE COURT
 35)
 36 Defendants.)
 37)
 38 _____)
 39 UNITED STATES OF AMERICA,)
 40)
 41 Cross-Claimant,)

1 v.)
2)
3 BAE SYSTEMS SAN FRANCISCO SHIP)
REPAIR, INC.,)
4 Cross-Defendant.)

5 BAE SYSTEMS SAN FRANCISCO SHIP)
REPAIR, INC.,)
6 Cross-Claimant,)
7 v.)
8 UNITED STATES OF AMERICA,)
9 Cross-Defendant,)
10

11 BAE SYSTEMS SAN FRANCISCO SHIP)
REPAIR, INC.,)
12 Cross-Claimant,)
13 v.)
14 SEACOAST ELECTRONICS, INC.,)
15 Cross-Defendant.)
16

17 UNITED STATES OF AMERICA,)
18 Third-Party Plaintiff,)
19 v.)
20 SEACOAST ELECTRONICS, INC.,)
21 Third-Party Defendant.)
22

23)

24 The parties hereto, through the undersigned consents of their counsel-of-record, do
25 hereby jointly and respectfully request that all future dates, through and including trial
26 herein, be continued for a period of approximately three months in order to permit the parties
27

1 to fully explore the possibility of settlement. A settlement conference has been scheduled
2 by Magistrate Judge Maria Elena James for the first available date of June 9, 2009,
3 approximately three months from now. Pursuant to the existing pretrial order, the parties are
4 required to make their expert disclosures by the end of May when fact discovery is also
5 scheduled to close. For this reason, the parties agree and respectfully request that the current
6 pretrial schedule be vacated, and reset as follows:
7

- 8 1. Fact discovery closes and expert disclosures due August 28, 2009;
- 9 2. Dispositive motion hearing deadline of October 7, 2009, with attendant filing
10 deadline of September 2, 2009;
- 11 3. Expert discovery closes September 30, 2009;
- 12 4. Pretrial meet and confer by ~~December 2, 2009~~; pursuant to case management
13 order of 3/10/08
- 14 5. Pretrial Conference on ~~January 21, 2010~~, with *Daubert* motions filed thirty-five
15 May 6, 2010
16 days in advance;
- 17 6. All pretrial paperwork by ~~December 18, 2009~~; pursuant to case management order
18 of 3/10/08
- 19 7. Motions *in limine* filed by ~~January 8, 2010~~; and pursuant to case management
20 order of 3/10/08
- 21 8. Trial in late ~~February of 2010~~, depending on the Court's calendar.
22 June 14, 2010

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25 ///

26 ///

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28 ///

1 The parties previously sought and obtained one extension in the pretrial schedule.

2 No further extensions are anticipated at this time.

3 Dated: March 13, 2009

Law Offices of Lyle C. Cavin, Jr.

4 s/Christopher Goodroe

5 _____
6 CHRISTOPHER GOODROE

7 Attorneys for Plaintiff

8 Kari Preston

9 Dated: March 13, 2009

Buty & Curliano LLP

10 s/Madeline L. Buty

11 _____
12 MADELINE L. BUTY

13 Attorneys for Defendant

14 Bae Systems SF Ship Repairs, Inc.

15 Dated: March 13, 2009

Burnham Brown

16 s/Ronnie R. Gipson

17 _____
18 RONNIE R. GIPSON

19 Attorneys for Third-Party Defendant

20 Seacoast Electronics, Inc.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 Dated: March 13, 2009

MICHAEL F. HERTZ
Acting Assistant Attorney General
JOSEPH P. RUSSONIELLO
United States Attorney
R. MICHAEL UNDERHILL
Attorney in Charge, West Coast Office
Torts Branch, Civil Division

6 s/Jeanne M. Franken

7 _____
JEANNE M. FRANKEN
Trial Attorney
8 Torts Branch, Civil Division
9 CHAD KAUFFMAN
Trial Attorney
10 Torts Branch, Civil Division
11 U.S. Department of Justice

12 Attorneys for Defendant & Third-Party Plaintiff
13 United States of America

14 IT IS SO ORDERED this 18th day of March, 2009 in San Francisco, CA.



18 UNITED STATES DISTRICT JUDGE

19
20 CERTIFICATION OF SIGNATURES

21 I attest that the content of the document is acceptable to all persons required to sign
22 the document.

23
24 s/Jeanne M. Franken

25 _____
JEANNE M. FRANKEN

1
2 CERTIFICATE OF SERVICE

3 I hereby certify that, on the dates and by the methods of service noted below, a true
4 and correct copy of the forgoing STIPULATED ORDER TO EXTEND ALL DATES was
5 served on the following at their last known addresses:
6

7
8 Served Electronically through CM/ECF:

9 Ronald H. Klein cavin@earthlink.net March 13, 2009

10 Madeline L. Buty Kte@butycurliano.com March 13, 2009

11
12 Ronnie R. Gipson Cburnham@burnhambrown.com March 13, 2009

13
14
15
16 s/Jeanne M. Franken
17 JEANNE M. FRANKEN
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