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7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
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11 WELLS FARGO BANK, N.A. as TRUSTEE)
 FOR THE CLARA POPPIC TRUST,)

12 Plaintiffs,)

13 vs.)

14 RENZ, et al.,)

15 Defendants.)

16
 17 AND RELATED ACTIONS.)

Case No. CV 08 2561 SBA

**STIPULATION AND ORDER
 CONTINUING FACT DISCOVERY AND
 REBUTTAL EXPERT REPORTS
 DEADLINES**

18 Complaint Filed: May 21, 2008
 Discovery Cut-Off: Dec. 30, 2010
 19 Trial Date: June 20, 2011

20 Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rule 16-2(d), the parties
 21 to the above-entitled action hereby apply to this Court for relief from the current fact discovery
 22 deadline set in this action.

23 WHEREAS this Court most recently adjusted the case management schedule on
 24 November 15, 2010 (Doc. 270);

25 WHEREAS the parties, with the exception of Nan Y. Park, participated in a mediation
 26 session with Hon. Ronald M. Sabraw (Ret.) on September 23, 2010;
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 28

1 WHEREAS a further mediation session has been scheduled for January 5, 2011 at 9:30
2 a.m., again before Judge Sabraw at JAMS in San Francisco, at which client and insurance
3 representatives will be present;

4 WHEREAS the parties continue to engage in discovery and have completed the
5 depositions of several percipient witnesses and are in the process of scheduling and conducting
6 additional percipient depositions, including those of the FRCP 30(b)(6) depositions of Hoyt
7 Corporation and Vic Manufacturing Corporation, completing the deposition of Kazuko Umstead
8 and other witnesses;

9 WHEREAS this Court has not yet rendered its decision on the pending FRCP 12(b)(6)
10 motion of Hoyt Corporation;

11 WHEREAS the various regulatory stakeholders have not yet assessed the nature and
12 extent of the contamination at issue and the necessary scope of remediation;

13 WHEREAS Judge Sabraw believes that a brief continuance of the deadlines relating to
14 fact discovery will facilitate further settlement discussions; and

15 WHEREAS NAN Y. PARK has been non-communicative since the withdrawal of her
16 counsel.

17 THEREFORE, the parties stipulate and propose that:

- 18 1. The fact discovery cut-off be extended from the current deadline of December 30,
19 2010 to February 25, 2011, the current deadline for expert discovery; and
- 20 2. The deadline for exchange of expert rebuttal reports shall be moved from January
21 7, 2011, to February 1, 2011.

22
23 Agreed and approved as to content and form by counsel for the parties as indicated below:

24
25 Date: December 8, 2008

BASSI, EDLIN, HUIE & BLUM LLP

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27 By: _____
28 JOSEPH B. ADAMS, ESQ.
Attorneys for KAZUKO UMSTEAD

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Date: December 8, 2008

DONGELL LAWRENCE FINNEY LLP

By: _____
IAN CULVER, ESQ.
Attorneys for WELLS FARGO BANK, N.A., AS
TRUSTEE FOR THE CLARA POPPIC TRUST

Date: December 8, 2008

By: _____
GUAN CHAO HUANG.
IN PRO PER

Date: December 8, 2008

WEYLAND LAW FIRM

By: _____
REBECCA HOBERG, ESQ.
Attorneys for BOWE PERMAC, INC. & VIC
MANUFACTURING COMPANY

Date: December 8, 2008

LAW OFFICE OF PETER LIEDERMAN

By: _____
PETER H. LIEDERMAN, ESQ.
Attorneys for KENNETH G. RENZ & ESTATE
OF JACKSON R. DENNISON

Date: December 8, 2008

FOLEY, BARON, METZGER, PLLC

By: _____
BRIAN H. PHINNEY, ESQ.
Attorneys for HOYT CORPORATION

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Date: December 8, 2008

NEWMAN MARCUS LLP

By: _____
EDWARD NEWMAN
Attorneys for VALUES, INC.

IT IS SO ORDERED

DATED: 12/27/10

Aundra B. Armstrong
UNITED STATES DISTRICT JUDGE

1 UNITED STATES DISTRICT COURT
2 FOR THE
3 NORTHERN DISTRICT OF CALIFORNIA
4

5 WELLS FARGO BANK N.A. et al,

Case Number: CV08-02561 SBA

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7 **CERTIFICATE OF SERVICE**
8

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12 Plaintiff,

13 v.

14 RENZ et al,

15 Defendant.
16
17 _____/

18 I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District
19 Court, Northern District of California.

20 That on December 28, 2010, I SERVED a true and correct copy(ies) of the attached, by placing
21 said copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by
22 depositing said envelope in the U.S. Mail, or by placing said copy(ies) into an inter-office
23 delivery receptacle located in the Clerk's office.

24 Guan Huang

25 2683 22nd Street

26 San Francisco, CA 94110

27 Nan Y. Park
28

261931

1 8306 Wilshire Boulevard
2 Suite 560
3 Beverly Hills, CA 90211
4
5 Won Jae Yi
6 2565 Telegraph Avenue
7 Berkeley, CA 94704
8 Dated: December 28, 2010
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Richard W. Wieking, Clerk

By: LISA R CLARK, Deputy Clerk

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