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10 Attorneys for DAVID A. BRADLOW,
 11 Chapter 11 Trustee and Appellee

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 OAKLAND DIVISION

15 In re
 16 600 ALABAMA LLC,
 17 a California corporation,
 18 Debtor.

Case No. CV 09-04378 SBA
 Bk. No. 08-31434-DM
 Chapter 11

19 MARIN MORTGAGE BANKERS CORP
 20 (“MMB”), as servicing agent for CHARLES J.
 21 FLYNN AND/OR MIK P. FLYNN, OR
 22 THEIR SUCCESSORS IN TRUST, UNDER
 23 THE FLYNN FAMILY LIVING TRUST,
 24 DATED MAY 7, 1999, AND ANY
 25 AMENDMENTS THERETO ET AL AS TO
 26 AN UNDIVIDED \$1,270,000.00 INTEREST,

**SECOND STIPULATION AND ORDER
 RE EXTENSION OF TIME FOR FILING
 APPELLEE’S OPENING BRIEF RE
 APPEAL FROM BANKRUPTCY COURT**

[Civil L.R. 6-2, Civil L.R. 7-12]

Appellant,

vs.

27 DAVID A. BRADLOW, CHAPTER 11
 28 TRUSTEE OF THE ESTATE OF 600
 ALABAMA LLC,

Appellee.

1 1. On November 2, 2009, the parties in the above-referenced appeal which is from an order of the
2 United States Bankruptcy Court, Marin Mortgage Bankers Corp (“MMB”), as Servicing Agent for
3 Charles J. Flynn And/Or Mik P. Flynn, or Their Successors In Trust, Under The Flynn Family Living
4 Trust, Dated May 7, 1999, and any Amendments Thereto et al as to An Undivided \$1,270,000.00
5 Interest (“Appellant”) and David A. Bradlow, Chapter 11 Trustee of 600 Alabama LLC (“Appellee”),
6 by and through their counsel of record, stipulated that the time for filing the Appellee’s Opening Brief
7 be continued for fifteen (15) days (“First Stipulation”). On November 4, 2009, the Court so ordered.

8 2. Pursuant to this Second Stipulation And Order Re Extension Of Time For Filing
9 Appellee’s Opening Brief Re Appeal From Bankruptcy Court (“Second Stipulation”), the parties
10 named in Paragraph 1 above, by and through their counsel of record, stipulate that the time for filing
11 the Appellee’s Opening Brief be further continued for an additional thirty (30) days.

12 3. By way of the First Stipulation, the Appellee’s Opening Brief was to be due on
13 December 1, 2009. Pursuant to this Second Stipulation, the parties agree that that time period may be
14 extended until January 2, 2010.

15 DATED: November 18, 2009

Respectfully submitted,
LUCE, FORWARD, HAMILTON & SCRIPPS LLP

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18 By: /s/Michael A. Isaacs, Esq., CSBN 99782
MICHAEL A. ISAACS
Attorneys for DAVID A. BRADLOW,
19 Chapter 11 Trustee and Appellee

20 **DECLARATION RE LOCAL RULE 6-2**

21 I, Michael A. Isaacs, declare as follows:

22 4. I am a partner in the law firm of Luce, Forward, Hamilton & Scripps LLP, counsel for
23 David A. Bradlow, Chapter 11 Trustee of the estate of 600 Alabama LLC (the “Trustee”).

24 5. This appeal is from an order by the United States Bankruptcy Court for the Northern
25 District of California, the Honorable Dennis Montali, denying Appellant’s motion to remove the
26 Trustee.

27 6. The Court’s records reflect that on September 17, 2009, Appellant filed its Notice of
28 Appeal from Bankruptcy Court.

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NOW, THEREFORE THE PARTIES STIPULATE to the entry of an order extending the time period within which the Appellee must file its Opening Brief until January 2, 2010.

DATED: November 20, 2009 SCHEER LAW GROUP, LLP

By: /s/Spencer P. Scheer, Esq., CSBN 107750
SPENCER P. SCHEER,
Attorneys for Appellant MARIN MORTGAGE BANKERS CORP (“MMB”), as servicing agent for CHARLES J. FLYNN AND/OR MIK P. FLYNN, OR THEIR SUCCESSORS IN TRUST, UNDER THE FLYNN FAMILY LIVING TRUST, DATED MAY 7, 1999, AND ANY AMENDMENTS THERETO ET AL AS TO AN UNDIVIDED \$1,270,000.00 INTEREST,

DATED: November 18, 2009 LUCE, FORWARD, HAMILTON & SCRIPPS LLP

By: /s/Michael A. Isaacs, Esq., CSBN 99782
MICHAEL A. ISAACS
Attorneys for Appellee DAVID A. BRADLOW, Chapter 11 Trustee

PURSUANT TO STIPULATION IT IS SO ORDERED

Dated: 11/25/09

Sandra B. Armstrong
JUDGE OF THE UNITED STATES DISTRICT COURT