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6 Attorneys for Defendants  
 CLAY COLLINS AND TODD COLLINS

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

11 NICOLE STRAWN )  
 )  
 12 Plaintiff, )  
 )  
 13 v. )  
 )  
 14 SHENANDOAH CHARTERS, CLAY )  
 COLLINS, TODD J. COLLINS, and DOES )  
 15 1-10, *in personam*, and FV )  
 SHENANDOAH, and her engines, tackle, )  
 16 apparel, etc., *in rem*, )  
 )  
 17 Defendants. )

Case No. CV-10-4015 PJH

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER TO EXTEND HEARING DATE  
 FOR MOTION FOR SUMMARY  
 JUDGMENT**

Complaint filed: September 8, 2010  
 Trial Date: May 21, 2012

19 Defendants CLAY COLLINS and TODD COLLINS, by and through their counsel of  
 20 record, Gibson Robb & Lindh LLP, and Plaintiff NICOLE STRAWN, by and through her  
 21 counsel of record, Brodsky Micklow Bull & Weiss LLP, hereby enter into the below stipulation  
 22 to request the continuation of the date to hear the motion for summary judgment filed by the  
 23 Defendants, currently set for hearing on the last day to hear dispositive motions, January 18,  
 24 2012.

25 This stipulation is made in consideration of the fact that the parties are scheduled to  
 26 participate in a full day mediation with Chris Lavdiotis on January 12, 2012, and wish to avoid  
 27 the cost of the full briefing (and consultation with experts), the need to file opposition papers  
 28 between Christmas and New Years, and to avoid the burden on the Court in ruling on the motion

1 if the matter can be settled at the up-coming mediation. This would not affect the trial date of  
2 May 21, 2012, or any other date set by the Court, and the request relates to the pending motion  
3 only.

4 Based on the foregoing, the parties submit that there is good cause to continue the hearing  
5 date on the Defendants' pending motion for summary judgment to a date after February 16, 2012,  
6 which would result in Plaintiff having at least two weeks following the mediation to file her  
7 opposition.

8  
9 Dated: December 19, 2011

BRODSKY MICKLOW BULL & WEISS LLP

10

11

By: S/ EDWARD M. BULL, III

Edward M. Bull, III

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Amy Jo Bull, Esq.

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Attorneys for Plaintiff

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NICOLE STRAWN

15 Dated: December 19, 2011

GIBSON ROBB & LINDH LLP

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17

By: S/ MARKER E. LOVELL, JR.

Marker E. Lovell, Jr.

18

Attorneys for Defendants

19

CLAY COLLINS AND TODD COLLINS

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**CERTIFICATE OF SIGNATURE**

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I attest that the content of this document is acceptable to attorney, Edward M. Bull III, and that he  
22 authorized me to sign the document on his behalf.

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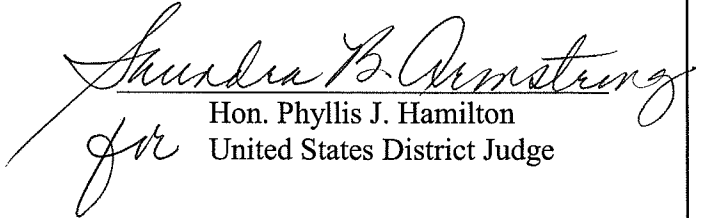
**ORDER**

**IT IS SO ORDERED.**

Based on the foregoing stipulation, the hearing on Defendants' motion for summary judgment is continued from January 18, 2012, to February 15, 2012.

All other dates remain unchanged.

Dated: 12-27, 2011

  
Hon. Phyllis J. Hamilton  
United States District Judge