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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 MITSUI O.S.K. LINES, LTD.,

12 Plaintiff,

13 v.

14 SHINE INTERNATIONAL
TRANSPORTATION (SHENZHEN)
15 LIMITED, R.T. EXPRESS
INTERNATIONAL, INC., TROY
16 CONTAINER LINE, LTD. and DOES
THREE THROUGH TWENTY,
17

18 Defendants.

Case No. 4:15-cv-03343-KAW

**STIPULATION TO CONTINUE CASE
MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER**

19
20 WHEREAS, pursuant to stipulation, the default of Defendant Shine International
21 Transportation (Shenzhen) Limited ("Shine") was set aside on November 30, 2015. On
22 December 1, 2015, MOL filed an amended complaint that added two additional defendants. MOL
23 served the amended complaint on Shine on December 1, 2015, and is in the process of serving the
24 two newly-added defendants; and,

25
26 WHEREAS, since December, MOL and Shine have been engaged in informal document
27 exchanges and settlement discussions and would like to continue this process for as long as it
28 remains productive; and,

1 WHEREAS, consistent with the foregoing, MOL and Shine respectfully believe that
2 certain dates should be extended/continued accordingly.

3 THEREFORE, the parties hereto do stipulated and agree and request the Court to order as
4 follows:

- 5 1) To extend the date for Shine to respond to the Amended Complaint to and including
- 6 February 5, 2016
- 7 2) To continue the CMC scheduled for January 19, 2016 to March 29, 2016;

8
9 Respectfully submitted,

10 Dated: January 14, 2016

CLYDE & CO US LLP

11 By: /s/ Conte C. Cicala

12 Conte C. Cicala
13 Attorneys for Plaintiff
14 MITSUI O.S.K. LINES, LTD.

15 Dated: January 14, 2016

GONZALEZ DEL VALLE LAW

16 By: /s/ Henry P. Gonzalez

17 Henry P. Gonzalez
18 Attorney-in-Fact
19 Shine International Transportation (Shenzhen)
20 Limited

L.R. 5-1(i) ATTESTATION

21 I, Conte C. Cicala, am the ECF user whose ID and password are being used to file the
22 attached Stipulation to Continue Case Management Conference; [Proposed] Order.

23 In compliance with Local Rule 5-1, I hereby attest that concurrence in the filing of this
document has been obtained from the other signatories.

24 Dated: January 14, 2016

/s/ Conte C. Cicala
Conte C. Cicala

CLYDE & CO US LLP
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~~[PROPOSED]~~ ORDER

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Pursuant to stipulation, and good cause having been shown thereby, this Court hereby

ORDERS as follows:

- 1) Shine shall have a further extension to respond to the Amended Complaint to and including February 5, 2016
- 2) The Case Management Conference scheduled for January 19, 2016 is continued to March 29, 2016, at 1:30 p.m.

IT IS SO ORDERED.

Dated: 1/15/16

Kandis Westmore

 UNITED STATES MAGISTRATE JUDGE

CLYDE & CO US LLP
 101 Second Street, 24th Floor
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