

1 ROBERT E. THURBON, SBN 133617
2 LINDSAY K. MOORE, SBN 244422
3 THURBON & MCHANEY, LP
4 2339 Gold Meadow Way, Suite 210
5 Gold River, California 95670
6 Telephone: (916) 636-1840
7 Facsimile: (916) 638-7530

8 Attorneys for Defendant
9 CLYDE G. STEAGALL, INC. and FIREMAN'S FUND
10 INSURANCE COMPANY

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

13 THE UNITED STATES OF AMERICA, for the
14 use and benefit of SUMMERS GROUP, INC., a
15 Delaware corporation doing business as REXEL
16 PACIFIC,

17 Use-Plaintiff,

18 v.

19 MID VALLEY ELECTRIC &
20 COMMUNICATIONS, INC., a corporation dba
21 CLYDE G. STEAGALL, INC.; FIREMAN'S
22 FUND INSURANCE COMPANY, a California
23 corporation,

24 Defendants.

25 AND ALL RELATED CROSS-ACTIONS

Case No.: C04-05458-JF/HRL

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE TRIAL

Trial Date: August 1, 2011

26 THE UNITED STATES OF AMERICA, for the use and benefit of SUMMERS GROUP
27 INC., a Delaware Corporation, doing business as REXEL PACIFIC; SQUARE D. COMPANY,
28 a Delaware Corporation; MID VALLEY ELECTRIC & COMMUNICATIONS, INC., a
corporation doing business as CLYDE G. STEAGALL, INC.; and FIREMAN'S FUND
INSURANCE COMPANY through their respective counsel, hereby make the following
stipulation.

1 WHEREAS, the Court adopted the proposed case schedule on August 6, 2010 and
2 scheduled a bench trial for August 1, 2011 and a pretrial conference for July 15, 2011;

3 WHEREAS, the parties have been unable to complete depositions of percipient witnesses
4 and expert witnesses in accordance with the Joint Case Management Conference Statement
5 adopted by the Court;

6 WHEREAS, the parties agree that this Court should continue the pretrial conference and
7 trial date as currently scheduled for ninety (90) days.

8 NOW THEREFORE, Plaintiff REXEL PACIFIC and Defendants CLYDE D.
9 STEAGALL, FIREMAN'S INSURANCE COMPANY, and SQUARE D hereby stipulate as
10 follows:

11 The pretrial conference schedule for July 15, 2011 shall be continued for ninety (90) days
12 to October 14, 2011.

13 The trial date currently scheduled for August 1, 2011 shall be continued for ninety (90)
14 days to ~~November 1~~^{October 31}, 2011.

15 IT IS SO STIPULATED.

16 [SIGNATURES ON FOLLOWING PAGE]
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1 Dated: *May 12, 2011*

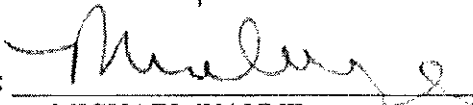
THURBON & McHANEY, LP

2
3 By: 

4 ROBERT E. THURBON
5 LINDSAY K. MOORE
6 Attorneys for Defendants
7 MID VALLEY ELECTRIC &
8 COMMUNICATIONS, INC., a corporation
9 dba CLYDE G. STEAGALL, INC.;
10 FIREMAN'S FUND INSURANCE

9 Dated: *April 25, 2011*

GIBBS, GIDEN, LOCHER, TURNER &
SENET, LLP

11 By: 

12 MICHAEL WAYNE
13 Attorneys for Third-Party Defendant
14 SQUARE D COMPANY, a Delaware
15 Corporation

16 Dated:

WALSH & WALSH, PC

18 By: _____

19 MICHAEL WALSH
20 Attorneys for Use-Plaintiff
21 THE UNITED STATES OF AMERICA, for
22 the use and benefit of SUMMERS GROUP,
23 INC., a Delaware Corporation doing
24 Business as REXEL PACIFIC

25 ~~PROPOSED~~ ORDER

26 PURSUANT TO STIPULATION, IT IS SO ORDERED.

27 DATED: 5/13/11

28 BY: 

THE HONORABLE JEREMY FOGEL
UNITED STATES DISTRICT JUDGE FOR
THE NORTHERN DISTRICT OF CALIFORNIA

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Dated:

THURBON & McHANEY, LP

By: _____

ROBERT E. THURBON
LINDSAY K. MOORE
Attorneys for Defendants
MID VALLEY ELECTRIC &
COMMUNICATIONS, INC., a corporation
dba CLYDE G. STEAGALL, INC.;
FIREMAN'S FUND INSURANCE

Dated:

**GIBBS, GIDEN, LOCHER, TURNER &
SENET, LLP**

By: _____

MICHAEL WAYNE
Attorneys for Third-Party Defendant
SQUARE D COMPANY, a Delaware
Corporation

Dated:

5/10/11

WALSH & WALSH, PC

By: *Michael Walsh*

MICHAEL WALSH
Attorneys for Use-Plaintiff
THE UNITED STATES OF AMERICA, for
the use and benefit of SUMMERS GROUP,
INC., a Delaware Corporation doing
Business as REXEL PACIFIC

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

BY: _____

THE HONORABLE JEREMY FOGEL
UNITED STATES DISTRICT JUDGE FOR
THE NORTHERN DISTRICT OF CALIFORNIA

1 The United States of America v. Mid Valley Electric & Communications, Inc., et al.
2 Case No. C04-05458

3 **PROOF OF SERVICE**

4 I, Jennifer Adame declare as follows:

5 I am over the age of 18 years and not a party to the within action. My place of
6 employment and business address is 2339 Gold Meadow Way, Suite 210, Gold River, CA 95670

7 On May 12, 2011, I served the following document(s):

8 **STIPULATION AND [PROPOSED] ORDER TO CONTINUE TRIAL**

9 **by mail** on the following party(ies) in said action, in accordance with Code of Civil
10 Procedure §1013(a), by placing a true copy thereof enclosed in a sealed envelope for
11 mailing in the United States mail, postage prepaid, at Gold River, California.

12 **by personally delivering** a true copy thereof, in accordance with Code of Civil
13 Procedure §1011, to the person(s) and at the address(es) set forth below.

14 Michael Walsh
15 Walsh & Walsh
16 420 Exchange, Suite 270
17 Irvine, CA 92602
18 Facsimile (714) 544-6621

Michael I. Wayne, Esq.
Gibbs, Given, Locher & Turner, LLP
1880 Century Park East, 12th Floor
Los Angeles, CA 90067-3039
Facsimile (310) 552-0805

19 I declare under penalty of perjury under the laws of the State of California that the
20 foregoing is true and correct and that this document was executed on Mat 12, 2011.

21 
22 _____
23 Jennifer Adame
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