

1 BOWMAN AND BROOKE LLP
 Daniel J. Smith (SBN 132748)
 2 Robert S. Robinson (SBN 131461)
 1741 Technology Drive, Suite 200
 3 San Jose, CA 95110-1355
 Telephone: (408) 279-5393
 4 Facsimile: (408) 279-5845
 E-mail: rob.robinson@bowmandbrooke.com

5 Attorneys for Defendant
 6 JONNA CORPORATION, INC. dba PREMIER RECYCLE COMPANY
 (erroneously sued as PREMIER RECYCLING)
 7

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10

11 NATIONAL UNION FIRE INSURANCE)
 COMPANY OF PITTSBURGH, PA, a)
 12 Pennsylvania Corporation,)

CV10-cv-01324-JF

13)
 14) Plaintiff,

vs.

**[PROPOSED] ORDER APPROVING
 STIPULATION EXTENDING TIME FOR
 DEFENDANT JONNA
 CORPORATION, INC. DBA PREMIER
 RECYCLE COMPANY TO ANSWER
 OR OTHERWISE RESPOND TO
 PLAINTIFF'S SECOND AMENDED
 COMPLAINT**

15 RESOURCE DEVELOPMENT SERVICES,)
 INC., JAMES LUCERO, an Individual,)
 16 SHELLEY LUCERO, an Individual,)
 ARACELLI FRANCO, an Individual, ELVIA)
 17 NENQUE, an Individual, MARTHA)
 RENTERIA, an Individual, JOE MORSE, an)
 18 Individual, TOM OVERTON, an Individual,)
 RICHARD ANDRADE, an Individual, JOSE)
 19 SALVATIER, an Individual, DANIEL)
 SANCHEZ, an Individual, RUDY)
 20 HERNANDEZ, an Individual, GUILLERMO)
 CEBALLOS, an Individual, RANDY)
 21 VARGAS, VALLEY RECYCLING,)
 RANDAZZO ENTERPRISES,)
 22 DOMINGUEZ & SONS, PREMIER)
 RECYCLING, PACIFIC COAST)
 23 RECYCLING, GIBSON'S RESOURCE)
 GROUP, CAL WASTE, ACCURATE)
 24 CLEANING SYSTEMS, ALVISO, A&S)
 METALS, D&C CONSTRUCTION, JLV)
 25 EQUIPMENT, DVBE TRUCKING,)
 NOGALERA TRUCKING, A&A)
 26 RECYCLING, BAY AREA HAULING)
 MAINTENANCE, DEPENDABLE WASTE)
 27 SOLUTIONS, PARAMOUNT DRYWALL,)
 RAD ROLL-OFF, ALL TRASH, BAY CAL)
 28 RECYCLING, JM HAULING, ALMADEN)

1 CONSTRUCTION, DEL TORO, ESPINOZA)
2 & DAUGHTER HAULING, AFFORDABLE)
3 ROOFING, and DOES 1 through 100,)
4 Defendants.)

5
6 The Court, having read the Stipulation of the Parties, and good cause appearing
7 therefor,

8 **IT IS HEREBY ORDERED** that defendant Premier Recycle's time to answer
9 National Union's second amended complaint is extended to and including June 30,
10 2011.

11 **IT IS SO ORDERED.**

12
13 DATED: June 20, 2011

14 
15 _____
16 Jeremy D. Fogel
17 United States District Judge
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I am over the age of 18 and not a party to the within action. My business address is 1741 Technology Drive, Suite 200, San Jose, CA 95110.

On June 16, 2011, I served a true and correct copy of the foregoing document entitled:

[PROPOSED] ORDER APPROVING STIPULATION EXTENDING TIME FOR DEFENDANT JONNA CORPORATION, INC. DBA PREMIER RECYCLE COMPANY TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S SECOND AMENDED COMPLAINT

on the following persons on this date and in the manner specified herein:

BY ELECTRONIC SERVICE THROUGH ECF PURSUANT TO GENERAL ORDER 45 on all counsel of record as indicated on the service list maintained by ECF for this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on June 16, 2011, at San Jose, California.


Jamie Lee Martinez