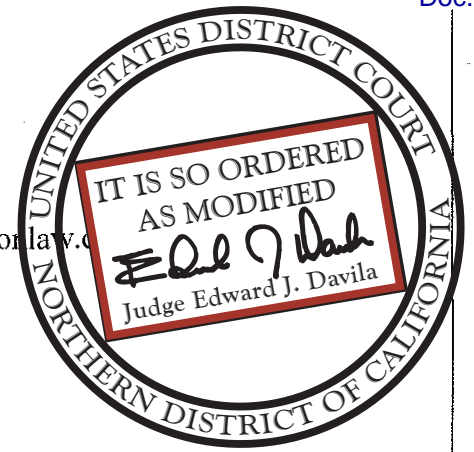


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6 Attorneys for Plaintiff and Counter-Defendant
 PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

11 PROBUILDERS SPECIALTY INSURANCE)
 COMPANY, RRG, a District of Columbia, Risk)
 12 Retention Group,)
 13 Plaintiff,)
 14 v.)
 15 VALLEY CORP. B., a California Corporation)
 formerly known as R.J. HAAS CORP.; RONALD)
 16 J. HAAS, an individual; TY LEVINE, an)
 individual; and KAREN LEVINE, an individual,)
 17 Defendants.)
 18

CASE NO.:5:10-cv-05533-EJD

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND DEADLINES**

19 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and Counter-
 20 Defendant PROBUILDERS SPECIALTY INSURANCE COMPANY, RRG (“ProBuilders”);
 21 Defendant and Counter-Claimants TY LEVINE, KAREN LEVINE (collectively “Levines”); and
 22 Defendant, Counter-Claimant and Third-Party Plaintiff RONALD J. HAAS (“Mr. Haas”); and Third-
 23 Party Defendant Certain Underwriters of Lloyds of London (“Lloyds”) to extend the current
 24 deadlines as follows¹:

25 Last Day to Complete Alternative Dispute Resolution March 27, 2012
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 28 ^{1/} See the concurrently filed “Declaration of James I. Silverstein in Support of Stipulation and [Proposed] Order to Extend Deadlines” for ProBuilders’ counsel’s explanation as to the need for this time extension.

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Expert Disclosure	May 11, 2012
Rebuttal Expert Disclosure	May 25, 2012
Close of Discovery	June 20, 2012
Last Day for Hearing on Objection to Expert Disclosure	June 29, 2012
Last Day for Hearing on Dispositive Motions	August 24, 2012

Moreover, the parties, in light of the continuance of the various discovery-related dates, stipulate to continue the Joint Pre-Trial Conference to August 10, 2012. ~~However, if dispositive motions are pending as of that date, the parties stipulate that the Joint Pre-Trial Conference will take place on the first available Friday at 11:00 a.m., which is at least 45 days after the Court rules on any pending dispositive motion.~~ Moreover, the parties stipulate that the deadline for filing the Pre-Trial Conference Statement will be 10 days before the Pre-Trial Conference.

IT IS SO STIPULATED.

DATED: January 6, 2012


YARON & ASSOCIATES

By: 

 GEORGE D. YARON
 JAMES I. SILVERSTEIN
 HIELAM CHAN
 Attorneys for Plaintiff and Counter-Defendant
 PROBUILDERS SPECIALTY INSURANCE
 COMPANY, RRG

DATED: January 6, 2012

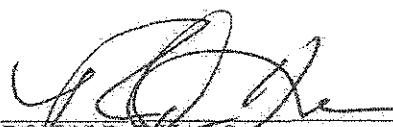
SILICON VALLEY LAW GROUP

By: 

 KIM O. DINCEL
 CHRISTOPHER G. LAJ
 Attorneys for Defendants
 TY LEVINE AND KAREN LEVINE

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DATED: January 6, 2012

By: 
RONALD J. HATAS
IN PRO SE

DATED: January __, 2012

WILLOUGHBY, STUART AND BENNING

By: _____
RANDALL WILLOUGHBY
Attorney for Third-Party Defendant
CERTAIN UNDERWRITERS OF LLOYDS OF
LONDON

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: _____
UNITED STATES DISTRICT JUDGE
EDWARD J. DAVILA

1 DATED: January __, 2012

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By: _____
RONALD J. HAAS
IN PRO SE

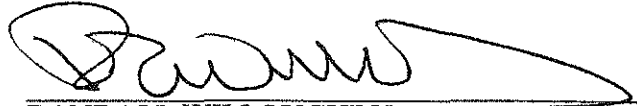
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6 DATED: January 5, 2012

WILLOUGHBY, STUART AND BENNING

7

By: 

RANDALL WILLOUGHBY
Attorney for Third-Party Defendant
CERTAIN UNDERWRITERS OF LLOYDS OF
LONDON

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ORDER

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Pursuant to Stipulation, the Preliminary Pretrial Conference is rescheduled to August 10, 2012, at 11:00 a.m. A Joint Preliminary Pretrial Conference statement shall be filed on or before July 31, 2012. This conference shall remain as scheduled regardless of whether dispositive motions remain pending at the time.

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DATED: January 12, 2012



UNITED STATES DISTRICT JUDGE
EDWARD J. DAVILA

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