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6 Attorneys for Petitioner, Counter Defendant  
and Third-Party Plaintiff  
7 WILLIAMS SPORTS RENTALS, INC.

8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10 IN ADMIRALTY

11 IN RE: COMPLAINT AND PETITION  
12 OF WILLIAMS SPORTS RENTALS,  
13 INC. AS OWNER OF A CERTAIN  
14 2004 YAMAHA WAVERUNNER FX  
140 FOR EXONERATION FROM OR  
LIMITATION OF LIABILITY

Case No. 2:17-cv-00653-JAM-EFB

Hon. John A. Mendez

15 MARIAN LATASHA WILLIS, on  
16 behalf of the Estate of RAESHON  
17 WILLIAMS,

*Respondent/Counter Claimant,*

18 v.

19 WILLIAMS SPORTS RENTALS, INC.,

*Petitioner/Counter Defendant.*

21 WILLIAMS SPORTS RENTALS, INC.,

22 *Petitioner, Counter Defendant, and*  
23 *Third-party Plaintiff,*

24 v.

25 THOMAS SMITH, KAI PETRICH,  
26 BERKELEY EXECUTIVES, INC.,  
ZIP, INC., and DOES 1-10,

27 *Third-party Defendants.*

**STIPULATION AND ORDER  
CONTINUING HEARING ON  
WILLIS'S MOTION TO LIFT STAY  
AND ABATE LIMITATION  
PROCEEDINGS**

1 WHEREAS Respondent and Counter Claimant MARIAN LATSHA WILLIS,  
2 on behalf of herself, the Estate of RAESHON WILLIAMS (“Decedent”) and  
3 Decedent’s father, Claimant Coole Theophalus Williams (collectively “Willis”) has  
4 filed a Motion ([ECF No. 90](#)) to lift the Rule F stay so she may proceed with an action  
5 against Petitioner, Counter Defendant, and Third-Party Plaintiff WILLIAMS  
6 SPORTS RENTALS, INC. (“WSR”) in state court and to abate the federal limitation  
7 proceedings;

8 WHEREAS WSR requests Willis’s responses to written discovery before  
9 serving its response to the motion that is due on May 5, 2020, and Willis requests  
10 until May 21, 2020 to complete those responses;

11 Willis and WSR stipulate that with permission of the Court, the hearing on  
12 Willis’s motion be continued until **June 16, 2020** with WSR’s response due no later  
13 than June 5, 2020.

14 **ORDER**

15 Pursuant to the stipulation of the parties, the hearing on Counter Claimant  
16 Willis’s motion ([ECF No. 90](#)) is continued to **June 16, 2020** at 1:30 p.m. WSR’s  
17 response is due no later than June 5, 2020.

18 **SO ORDERED (AS MODIFIED BY THE COURT)**

19  
20 Dated: April 23, 2020

21 /s/ John A. Mendez  
22 Hon. John Mendez  
23 U.S. DISTRICT COURT JUDGE  
24  
25  
26  
27  
28

1 So Stipulated.

2 Dated: April 22, 2020

3 **WILSON, ELSER, MOSKOWITZ,**  
4 **EDELMAN & DICKER LLP**

5 By: s/ B. Otis Felder

6 B. Otis Felder

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10 **THE VEEN FIRM**

11 By: s/ Steven A. Kroneberg (as authorized on 4/22/20)

12 Anthony L. Label

13 Steven A. Kronenberg

14 John R. Hillsman

15 Attorneys for MARIAN LATASHA WILLIS

16 Personal Representative of the Estate of RAESHON WILLIAMS

17 Respondent and Counter Claimant