

SOMACH SIMMONS & DUNN
A Professional Corporation

1 SOMACH, SIMMONS & DUNN
STUART L. SOMACH (State Bar No. 090959;
2 ssomach@somachlaw.com)
500 Capitol Mall, Suite 1000
3 Sacramento, CA 95814
Telephone (916) 446-7979; Facsimile (916) 446-8199
4 Attorneys for Plaintiffs
COUNTY OF SACRAMENTO
5 and SACRAMENTO COUNTY WATER AGENCY

6 RICHARD C. COFFIN (State Bar No. 70562;
rcc@bcltlaw.com)
7 BARG COFFIN LEWIS & TRAPP, LLP
350 California Street, 22nd Floor
8 San Francisco, California 94104-1435
Telephone (415) 228-5400; Facsimile (415) 228-5450
9 Attorneys for Defendants
THE BOEING COMPANY and MCDONNELL
10 DOUGLAS CORPORATION

11 LAWRENCE A. HOBEL, (State Bar No. 73364;
lhobel@cov.com)
12 COVINGTON & BURLING LLP
One Front Street
13 San Francisco, California 94111-53536
Telephone (415) 591-7028; Facsimile (415) 955-6528

14 BRIAN SWEENEY, (State Bar No. 195999,
15 brian.sweeney@aerojet.com)
AEROJET-GENERAL CORPORATION
16 P.O. Box 13222, Dept. 0106
Sacramento, California 95813-6000
17 Telephone (916) 351-8588; Facsimile (916) 351-8610
Attorneys for Defendants
18 AEROJET-GENERAL CORPORATION

19 UNITED STATES DISTRICT COURT

20 EASTERN DISTRICT OF CALIFORNIA

21 COUNTY OF SACRAMENTO;
22 SACRAMENTO COUNTY WATER AGENCY,

23 Plaintiffs,

24 v.

25 AEROJET-GENERAL CORPORATION; THE
26 BOEING COMPANY; MCDONNELL
DOUGLAS CORPORATION

27 Defendants.

Case No. 2:09-CV-01814-MCE-EFB

STIPULATION FOR FURTHER
STAY OF ACTION; ORDER

Date: No Hearing Requested
Time: N/A
Courtroom: 7

1 WHEREAS, under this Court's Stipulated Order of November 13, 2009, the
2 Parties are required to file a Joint Status Report and Rule 26(b) Discovery Plan in the above-
3 captioned matter by June 30, 2010;

4 WHEREAS, under the Court's Stipulated Order of November 13, 2009,
5 Defendants have until June 30, 2010, to file a response to the First Amended Complaint;

6 WHEREAS, the Parties continue to engage in meaningful settlement discussions,
7 and believe that a further stay of the litigation until November 30, 2010 is in the best interest of
8 all Parties, will promote judicial efficiency, and will reduce litigation costs because it will allow
9 the Parties to focus on such discussions;

10 WHEREAS, for these reasons, the Parties jointly seek this Court's Order to stay
11 the litigation until November 30, 2010, and to establish new dates for the filing of the Joint Status
12 Report and for Defendants' response to the First Amended Complaint;

13 THEREFORE:

14 IT IS HEREBY STIPULATED, by and between the Plaintiffs and Defendants that

15 1. Subject only to paragraph 4 below, the action be stayed until November 30,
16 2010, including all obligations pursuant to Rule 26, and any obligation to respond to the First
17 Amended Complaint.

18 2. Subject only to paragraph 4 below, the Joint Status Report is due on
19 December 28, 2010.

20 3. Subject only to paragraph 4 below, Defendants shall have until January 10,
21 2011, to respond to the First Amended Complaint.

22 4. If any party determines that the settlement discussions are not sufficiently
23 productive, the party may file and serve a request that the stay be lifted, and the stay shall be
24 lifted sixty (60) days after the Court issues an Order lifting the stay. If the stay is lifted prior to
25 November 30, 2010, the Court will set the last day for Defendants to file their responsive
26 pleadings, and the last day for the parties to file their Joint Status Report, for a day no less than
27 thirty (30) days after the stay is lifted.

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DATED: May 21, 2010

BARG COFFIN LEWIS & TRAPP, LLP

By: /s/ Richard C. Coffin
Richard C. Coffin
Attorneys for Defendant
THE BOEING COMPANY and
MCDONNELL DOUGLAS CORPORATION

DATED: May 21, 2010

COVINGTON & BURLING LLP

By: /s/ Lawrence A. Hobel
Lawrence A. Hobel
Attorneys for Defendant
AEROJET-GENERAL CORPORATION


DATED: May 21, 2010

SOMACH, SIMMONS & DUNN

By: /s/ Stuart L. Somach
Stuart L. Somach
Attorneys for Plaintiffs
COUNTY OF SACRAMENTO and
SACRAMENTO COUNTY WATER AGENCY

GOOD CAUSE APPEARING, IT IS SO ORDERED.

DATED: May 26, 2010


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE