

MILLER LAW GROUP
A PROFESSIONAL CORPORATION
SAN FRANCISCO, CALIFORNIA

1 Michele Ballard Miller (SBN 104198)
mbm@millerlawgroup.com

2 Lisa C. Hamasaki (SBN 197628)
lch@millerlawgroup.com

3 Katherine L. Kettler (SBN 231586)
klk@millerlawgroup.com

4 MILLER LAW GROUP
A Professional Corporation
111 Sutter Street, Suite 700
5 San Francisco, CA 94104
Tel. (415) 464-4300
6 Fax (415) 464-4336

7 Attorneys for Plaintiffs CHEVRON GLOBAL
TECHNOLOGY SERVICES COMPANY,
8 (formerly known as CHEVRONTEXACO
GLOBAL TECHNOLOGY SERVICES COMPANY)
9 and CHEVRON INTERNATIONAL EXPLORATION
AND PRODUCTION COMPANY (formerly known as
10 CHEVRONTEXACO OVERSEAS PETROLEUM),
a Division of CHEVRON U.S.A. INC.

11
12 Lisa Tan (SBN 228326)
ltan@rrjlaw.com
13 RUSSAKOW | RYAN | JOHNSON
A Professional Law Corporation
225 S. Lake Avenue, 10th Floor
14 Pasadena, CA 91101
Tel. (626) 683-8869
15 Fax (626) 683-8870

16 Attorneys for Defendant
17 MICHAEL S. LITTLE

18 **UNITED STATES DISTRICT COURT**

19 **NORTHERN DISTRICT OF CALIFORNIA**

20 CHEVRON GLOBAL TECHNOLOGY
SERVICES COMPANY, (formerly known as
21 CHEVRONTEXACO GLOBAL
TECHNOLOGY SERVICES COMPANY) and
22 CHEVRON INTERNATIONAL
EXPLORATION AND PRODUCTION
COMPANY (formerly known as
23 CHEVRONTEXACO
OVERSEAS PETROLEUM), a Division of
24 CHEVRON U.S.A. INC.

Case No. C 06 3157 MMC

**STIPULATION AND ~~PROPOSED~~
ORDER TO FURTHER STAY
PROCEEDINGS AND CONTINUE
CASE MANAGEMENT CONFERENCE**

Complaint Filed: May 11, 2006

25 Plaintiffs,

26 v.

27 MICHAEL S. LITTLE,

28 Defendant.

1 Plaintiffs CHEVRON GLOBAL TECHNOLOGY SERVICES COMPANY
2 (CHEVRON "GLOBETECH"), formerly known as CHEVRONTEXACO GLOBAL
3 TECHNOLOGY SERVICES COMPANY, and CHEVRON INTERNATIONAL
4 EXPLORATION AND PRODUCTION COMPANY ("CIEP"), formerly known as
5 CHEVRONTEXACO OVERSEARS PETROLEUM, a division of CHEVRON U.S.A. INC.
6 (referred to collectively as "Plaintiffs") and Defendant Michael S. Little, through their
7 respective counsel agree and stipulate as follows:

8 1. This is a diversity action for breach of contract and the implied covenant
9 of good faith and fair dealing in which Plaintiffs contend that by filing a lawsuit against
10 Plaintiffs in Venezuela – instead of California – Defendant breached forum selection clauses
11 entered into by the parties.

12 2. Defendant denies Plaintiffs' allegations.

13 3. On August 10, 2007, a Venezuela court dismissed Defendant's case
14 against Plaintiffs on the merits.

15 4. On or about December 4, 2007, the Venezuelan appellate level court
16 denied Defendant's appeal.

17 5. In December 2007, Defendant appealed to the Venezuelan Supreme
18 Tribunal of Justice.

19 6. The parties have been informed that the Venezuelan Supreme Court
20 could take as many as 12 months to rule on Defendant's appeal.

21 7. The Venezuelan Supreme Court has not yet ruled on the Defendant's
22 appeal.

23 8. At the parties' further Case Management Conference held on
24 September 7, 2007, this Court vacated trial and related dates pending the outcome of the
25 parties' Venezuelan litigation.

26 9. In light of the fact that the appeal is ongoing, the parties agree and
27 request of the Court that all proceedings remain stayed until the Venezuelan litigation is
28 concluded.

1 10. Further the parties agree and request of the Court that the Case
2 Management Conference scheduled for December 5, 2008, at 10:30 a.m., be continued to a
3 date at least six months from the date of this filing, at which time the parties will provide the
4 Court with a status update.

5 **IT IS SO STIPULATED:**

6 Dated: November 21, 2008

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8 By: /s/
9 Katherine L. Kettler
10 Attorneys for Plaintiffs CHEVRON GLOBAL
11 TECHNOLOGY SERVICES COMPANY,
12 (formerly known as CHEVRONTEXACO
13 GLOBAL TECHNOLOGY SERVICES
14 COMPANY) and CHEVRON
15 INTERNATIONAL EXPLORATION AND
16 PRODUCTION COMPANY(formerly known
17 as CHEVRONTEXACO OVERSEAS
18 PETROLEUM), a Division of CHEVRON
19 U.S.A. INC.

16 Dated: November 21, 2008

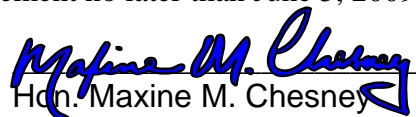
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A Professional Law Corporation

18 By: /s/
19 Lisa Tan
20 Attorneys for Defendant MICHAEL S. LITTLE

21 **ORDER**

22 IT IS HEREBY ORDERED that this action shall be further stayed until the
23 Venezuelan litigation is concluded, and the Case Management Conference scheduled for
24 December 5, 2008 at 10:30 a.m. shall be continued until June 12, 2009. The parties
25 shall file a Joint Case Management Conference Statement no later than June 5, 2009.

26 Dated November 25, 2008


27 Hon. Maxine M. Chesney
28 United States District Court Judge