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 10 MANAGEMENT LTD, SYNERGY MANAGEMENT  
 SERVICES; and SYNERGY MARINE LTD.  
 11

12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT OF CALIFORNIA**  
 14

15 PEOPLE OF THE STATE OF CALIFORNIA ex ) Case No. C 09-01469 (SC)  
 rel. DEPARTMENT OF FISH AND GAME; )  
 16 PEOPLE OF THE STATE OF CALIFORNIA ex ) IN ADMIRALTY  
 rel. CALIFORNIA REGIONAL WATER )  
 17 QUALITY CONTROL BOARD, SAN ) And consolidated cases:  
 FRANCISCO BAY REGION; AND PEOPLE ) CV 08 5098 (SC),  
 18 OF THE STATE OF CALIFORNIA ex rel. ) C 07 06045 (SC),  
 STATE LANDS COMMISSION, ) CV 07 05800 (SC),  
 19 ) CV 08 02052 (SC),  
 Plaintiff, ) CV 08 2268 (SC)  
 20 )

21 vs. )

22 REGAL STONE LTD.; FLEET ) **STIPULATION TO CONSOLIDATE CASE**  
 MANAGEMENT LTD.; HANJIN SHIPPING ) **WITH CASE NOS.:**  
 23 CO. LTD.; SYNERGY MANAGEMENT ) **CV 08 5098 (SC),**  
 SERVICES; SYNERGY MARINE LTD.; JOHN ) **C 07 06045 (SC),**  
 24 J. COTA, AN INDIVIDUAL; AND DOES 1 ) **CV 07 05800 (SC),**  
 THROUGH 100, ) **CV 08 02052 (SC), AND**  
 25 Defendants. ) **CV 08 2268 (SC)**  
 ) **FOR PRETRIAL AND DISCOVERY**  
 26 ) **PURPOSES**  
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1 THE PARTIES TO THIS STIPULATION, by and through their respective counsel  
2 hereby stipulate that this case shall be consolidated for pretrial and discovery purposes with the  
3 following related cases, which cases were consolidated by order of the Court dated February 3, 2009  
4 (collectively, "Consolidated Cases"):

5 Chelsea, LLC v. Regal Stone Limited, et al., Case No. 07-05800 (SC).

6 U.S. et al. v. M/V Cosco Busan, et al., Case No. 07-06045(SC)

7 The Continental Insurance Co. v. Regal Stone Limited, et al.,  
8 Case No. 08-02052 (SC).

9 The People of the State of California v. Regal Stone Limited, et al.,  
10 Case No. 08-2268 (SC).

11 Regal Stone Limited, et al. v. John J. Cota, The San Francisco Bar  
12 Pilot's Association, et al., Case No. 08-5098 (SC).

13 WHEREAS, on February 3, 2009, the Court issued an order consolidating the  
14 Consolidated Cases for pretrial and discovery purposes only.

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16 WHEREAS, this action was not subject to the February 3, 2009 Order consolidating  
17 the Related Cases for pretrial and discovery purposes only as this action was not removed to federal  
18 court until April 8, 2009.

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20 WHEREAS, the parties hereto agree that consolidation of this case for pretrial and  
21 discovery purposes is appropriate as this case arises out of the same underlying incident, the  
22 November 7, 2007 allision of the *M/V COSCO BUSAN* and the Bay Bridge and involves common  
23 questions of law or fact with the Consolidated Cases.

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1 WHEREAS, consolidating this action with the Consolidated Cases for pretrial and  
2 discovery purposes only will save time and effort because it will avoid duplication of depositions and  
3 other discovery.

4 **IT IS SO STIPULATED AND AGREED.**

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6 **People of the State of California ex rel. Dep't of Fish and Game, et al. v.**

7 **Regal Stone Limited, et al., Case No. C 09-01469 (SC)**

8  
9 DATED: August 31, 2009

/s/ Kevin D. Lesh

EDMUND G. BROWN JR.

J. MATTHEW RODRIQUEZ

MARY E. HACKENBRACHT

CHRISTINA TIEDEMANN

ROBERT W. BYRNE

KEVIN D. LESH

SUSAN A. AUSTIN

Attorneys for Plaintiffs PEOPLE OF THE STATE OF  
CALIFORNIA, EX REL. DEPARTMENT OF FISH  
AND GAME; PEOPLE OF THE STATE OF  
CALIFORNIA EX REL. CALIFORNIA REGIONAL  
WATER QUALITY CONTROL BOARD, SAN  
FRANCISCO BAY REGION; and PEOPLE OF THE  
STATE OF CALIFORNIA EX REL STATE LANDS  
COMMISSION

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19 DATED: August 31, 2009

/s/ Joseph A. Walsh II

JOSEPH A. WALSH II

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20  
21  
22  
23  
24  
25 DATED: August 31, 2009

/s/ Erich Paul Wise

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Attorneys for Defendant HANJIN SHIPPING CO., LTD.

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28 *[SIGNATURES CONTINUE ON NEXT PAGE]*

1 DATED: August 31, 2009

/s/ Walter Gerard Coppenrath, Jr.  
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Attorneys for Defendant JOHN J. COTA

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Regal Stone, et al. v. Cota, et al., Case No. 08-05098

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4 DATED August 31, 2009

/s/ Joseph A. Walsh II  
JOSEPH A. WALSH II  
KEESAL, YOUNG & LOGAN  
Attorneys for Plaintiff  
REGAL STONE LIMITED and  
FLEET MANAGEMENT LTD

5  
6  
7  
8 DATED: August 31, 2009

/s/ Ryan Donlon  
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Attorneys for Defendants  
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FRANCISCO BAR PILOTS

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14  
15 DATED: August 31, 2009

/s/ Kent Roberts  
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JOHN COTA

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U.S., et al. v. M/V Cosco Busan, et al., Case No. 07-06045

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4 DATED: August 31, 2009

/s/ R. Michael Underhill  
R. MICHAEL UNDERHILL  
BRADLEY ROBERT O'BRIEN  
U.S. DEPARTMENT OF JUSTICE  
Attorney for Plaintiff, Counter-Defendant and Third  
Party Plaintiff  
UNITED STATES OF AMERICA

8  
9 DATED: August 31, 2009

/s/ Joseph A. Walsh II  
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Defendants and Counter-Claimants REGAL STONE  
LIMITED and FLEET MANAGEMENT LTD

13  
14 DATED: August 31, 2009

/s/ Walter Gerard Coppenrath, Jr.  
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COPPENRATH & ASSOCIATES  
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JOHN COTA

17  
18 DATED: August 31, 2009

/s/ Sonja Marie Dahl  
SONJA MARIE DAHL  
DONNELLY NELSON DEPOLO & MURRAY  
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CHARLES CALZA

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23 *[SIGNATURES CONTINUED ON NEXT PAGE]*  
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Chelsea, LLC, et al. v. Regal Stone, Ltd., et al., Case No. C-07-5800

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4 DATED: August 31, 2009

/s/ William M. Audet  
WILLIAM M. AUDET  
ADEL NADJI  
AUDET & PARTNERS, LLP  
Attorney for Plaintiffs  
CHELSEA, LLC, MARK RUSSO and  
ALLEN LORETZ

8  
9 DATED: August 31, 2009

/s/ Joseph A. Walsh II  
JOSEPH A. WALSH II  
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Attorneys for Defendants  
REGAL STONE LIMITED, FLEET MANAGEMENT  
LTD, M/V COSCO BUSAN, and SYNERGY  
MARITIME LTD.

13  
14 DATED: August 31, 2009

/s/ Erich Paul Wise  
ERICH PAUL WISE  
FYLNN, DELICH & WISE  
Attorneys for Defendant  
HANJIN SHIPPING CO.

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Continental Insurance Co., et al. v. Cota, et al., Case No. 08-02052

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4 DATED: August 31, 2009

/s/ Samuel Harold Ruby  
SAMUEL HAROLD RUBY  
KEVIN KIN-MAN HO  
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Attorneys for Plaintiff/Counter-Defendant  
CONTINENTAL INSURANCE COMPANY

5  
6  
7  
8 DATED: August 31, 2009

/s/ Marc J. Derewetzky  
MARC J. DEREWETZKY  
MORISON HOLDEN DEREWETZKY & PROUGH,  
LLP  
Attorneys for Plaintiff-In-Intervention  
RLI INSURANCE COMPANY

9  
10  
11  
12  
13 DATED: August 31, 2009

/s/ Joseph A. Walsh II  
JOSEPH A. WALSH II  
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Attorneys for Defendant M/V COSCO BUSAN and  
Defendants/Counter-Claimants/Third-Party Plaintiffs  
REGAL STONE LIMITED and FLEET  
MANAGEMENT LTD

14  
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16  
17  
18 DATED: August 31, 2009

/s/ David Schack  
DAVID SCHACK  
LUKE ANDERSON  
K&L GATES LLP  
Attorneys for Cross-Defendant  
JOHN COTA

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20  
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22  
23 DATED: August 31, 2009

/s/ Randy Scott Erlewine  
RANDY SCOTT ERLEWINE  
PHILLIPS & ERLEWINE LLP  
Attorneys for Third Party Defendants  
THE SAN FRANCISCO BAR PILOTS and The SAN  
FRANCISCO BAR PILOTS BENEVOLENT &  
PROTECTIVE ASSOCIATION

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*[SIGNATURES CONTINUED ON NEXT PAGE]*



People of the State of California v. Regal Stone, Ltd., et al., Case No. 08-02268

1  
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3  
4 DATED: August 31, 2009

/s/ Jeffrey Richard Vincent  
JEFFREY RICHARD VINCENT  
JUDITH JOYCE LOACH  
OFFICE OF THE ATTORNEY GENERAL OF THE  
STATE OF CALIFORNIA  
*Attorneys for Counter-Defendant State of California,  
acting by and through the Board of Pilot Commissioners*

8  
9 DATED: August 31, 2009

/s/ David Sullivan  
BRUCE A. BEHRENS  
DAVID GOSSAGE  
KARL SCHMIT  
WM. DAVID SULLIVAN  
PATRICK PETERSON  
*Attorneys for Plaintiff and Counter-Defendant  
PEOPLE OF THE STATE OF CALIFORNIA acting by  
and through the Department of Transportation*

15  
16 DATED: August 31, 2009

/s/ Joseph A. Walsh II  
JOSEPH A. WALSH II  
KEESAL, YOUNG & LOGAN  
*Attorneys for Defendant/Counter-Claimant  
REGAL STONE LIMITED and Defendant M/V COSCO  
BUSAN*

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**ORDER**

Based upon the foregoing Stipulation of the Parties, and good cause appearing therefore, Case No. C09-01469(SC) shall be consolidated for pretrial and discovery purposes with Case Nos. CV 08 5098 (SC), C 07 06045 (SC), CV 07 05800 (SC), CV 08 02052 (SC), and CV 08 2268 (SC).

**IT IS SO ORDERED.**

DATED: September 1, 2009

