

1 Daniel D. Harshman, State Bar No. 177139
 COZEN O'CONNOR
 2 425 California Street, Suite 2400
 San Francisco, CA 94104
 3 Telephone: 415.617.6103
 Facsimile: 415.617.6101
 4 Email: dharshman@cozen.com

5 Christopher B. Kende, State Bar No. 182711
 Christopher Raleigh, *Admitted Pro Hac Vice*
 6 COZEN O'CONNOR
 45 Broadway, 16th Floor
 7 New York, NY 10006
 Telephone: 212.509.9400
 8 Facsimile: 212.509.9492
 Email: ckende@cozen.com
 9 Email: craleigh@cozen.com

10 Attorneys for Defendant
 AIR FRANCE

11
 12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

14 CARMELITA LLORERA, ESTATE OF ROMIEL
 LLORERA,

15 Plaintiffs,

16 vs.

17 AIR FRANCE-KLM, COMPAGNIE NATIONAL AIR
 18 FRANCE, AND DOES 1 through 50,

19 Defendants.

) Case No.: CV 08-001:34-SC

) **STIPULATION AND [PROPOSED] ORDER**
) **TO REMOVE DEFENDANT'S MOTION**
) **FOR LETTERS OF REQUEST FROM THE**
) **FEBRUARY 6, 2009 CALENDAR IN LIGHT**
) **OF TENTATIVE SETTLEMENT**

21
 22 Pursuant to United States District Court, Northern District of California, Civil Local Rule
 23 6-2 AND 7-12, it is hereby stipulated by and between plaintiffs, Carmelita Llorera, Estate of
 24 Romiel Llorera ("Plaintiffs") and defendant, Air France ("Defendant"), that subject to court
 25 approval, the hearing on Defendant's Motion for Letters of Request shall be removed from the
 26 Court's Calendar at 10:00 a.m. on Friday February 6, 2009 and shall be returned to the Court's
 27

1 originally scheduled calendar at 10:00 a.m. on March 6, 2009. The parties reached a tentative
2 settlement during a mediation held on Tuesday, February 03, 2009. The tentative settlement
3 is subject to the approval of the defendant's insurance carrier. The defendant recommends
4 that its insurance carrier approve the settlement and, accordingly, the parties anticipate final
5 authority will be received within next five business days. In light of the tentative settlement,
6 the parties desire to avoid further expense and further inconvenience to the Court.

7 In the event the Court grants this Stipulation and Proposed Order, the effect would be to
8 remove the hearing set for 10:00 a.m. on Friday, February, 6, 2009 and return the Defendant's
9 Motion for Letters of Request to the original calendar for March 6, 2009 at 10:00 a.m. Once
10 authority is received for the settlement, the parties anticipate that all motions would be
11 promptly taken off calendar and the case dismissed. Therefore, the parties hereto, by and
12 through the undersigned counsel, agree to the following:

13 1. The hearing on Defendant's Motion for Letters of Request previously set for
14 Friday, February 6, 2009 at 10:00 a.m. shall be taken off calendar.

15 2. Defendant's Motion for Letters of Request shall be returned to the original
16 calendar on Friday, March 6, 2009 at 10:00 a.m. in Courtroom 1 on the 17th Floor, U.S.
17 Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102

18 Dated: February 4, 2009

Alexander Anolik, a PLC
Attorneys for Plaintiffs

19
20
21 By: /s/ Alexander Anolik
22 Alexander Anolik (State Bar No. 042685)
23 Adam Anolik (State Bar No. 255083)
24 2107 Van Ness Ave, Suite 200
25 San Francisco, CA 94109
26 Telephone: (415) 673-333
27 Facsimile: (415) 673-3548

28 *(signatures continued on next page)*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COZEN O'CONNOR

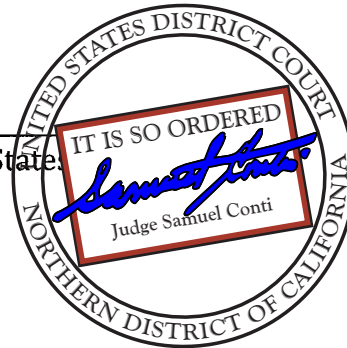
By: /s/ Daniel D. Harshman
Daniel D. Harshman (State Bar No. 177139)
425 California Street, Suite 2400
San Francisco, CA 94104

Christopher B. Kende (State Bar No. 182711)
Christopher Raleigh (*pro hac vice*)
45 Broadway, 16th Floor
New York, New York 10006
Attorneys for Defendant
AIR FRANCE

PURSUANT TO STIPULATION IT IS SO ORDERED:

Dated: February 5, 2009

United States



SAN_FRANCISCO\51023\1 217159.000