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	1 2 3 4 5	Michael B. Moore, Esq. (SBN 62182) Law Office of Michael B. Moore 100 Spear Street, Suite 1640 San Francisco, California 94105 Telephone: (415) 956-6500 Facsimile: (415) 956-6580 Email: mbm@moore-law.net Robert H. Ludlow, Jr., Esq. (36440) P. O. Box 1184 Santa Cruz, CA 95061 Telephone: (831) 475-5592	
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	8	Attorneys for Plaintiffs	
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	10	UNITED STATES DISTRICT COURT	
	11	NORTHERN DISTRICT OF CALIFORNIA	
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	13	GREG A. PEREYRA, an incompetent, by and through his Guardian Ad Litem, HUGO PEREYRA and MARTHA PEREYRA Plaintiffs, v.	CASE NO.: 08-01063-MMC
	14		STIPULATION RE SUBMISSION OF PETITION TO APPROVE COMPROMISE OF DISPUTED CLAIM OF ADULT PERSON WITH A DISABILITY WITHOUT A HEARING OR, IN THE ALTERNATIVE, TO SCHEDULING A HEARING ON OR BEFORE DECEMBER 19, 2008; ORDER SETTING HEARING
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	18	FORD MOTOR COMPANY and DOES 1-50,	
	19	inclusive,	
	20	Defendants.	Judge: Hon. Maxine M. Chesney
	21		oudge.
	22	Whereas, Plaintiffs and Defendant Ford Motor Company have agreed to a settlement in this matter; and Whereas, California Law requires that the settlement be approved by the Court pursuant to	
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	27 28	STIPULATION RE SUBMISSION OF PETITION TO APPROVE COMPROMISE OF DISPUTED CLAIM OF ADULT PERSON WITH A DISABILITY WITHOUT A HEARING OR, IN THE ALTERNATIVE, TO SCHEDULING A HEARING ON OR BEFORE DECEMBER 19, 2008 CASE NO.: 08-01063-MMC	
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a Petition to Approve Compromise; and

Whereas, it is imperative from the point of view of Ford Motor Company that this settlement be approved and this matter be finalized no later than December 19, 2008; and

Whereas, Plaintiffs consider it to be urgent to finalize this settlement so that the settlement funds can be received as soon as possible due to financial concerns relating to Ford Motor Company;

Whereas, in order to obtain approval of this compromise by the Court before December 19, 2008 it is necessary for the Court to take this matter under submission based on the Petition without a hearing and rule before December 19, 2008 or to set this matter for hearing on or before December 19, 2008; and

Whereas, Plaintiffs and Defendant Ford Motor Company all request the granting of this Petition and do not contest this Petition;

Therefore it is stipulated by and between Plaintiffs Greg Pereyra by and through his guardian ad litem Hugo Pereyra and Defendant Ford Motor Company that the Petition to Approve Compromise of Disputed Claim of Adult Person with Disability may be submitted on the papers and ruled on on or before December 19, 2008 or, in the alternative, that said Petition may be set for hearing on or before December 19, 2008.

Dated: 12/12/08 Dated:

Randall Haimovici, Esq., Attorney for Defendant Ford Motor Company

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a Petition to Approve Compromise; and

Whereas, it is imperative from the point of view of Ford Motor Company that this settlement be approved and this matter be finalized no later than December 19, 2008; and

Whereas, Plaintiffs consider it to be urgent to finalize this settlement so that the settlement funds can be received as soon as possible due to financial concerns relating to Ford Motor Company;

Whereas, in order to obtain approval of this compromise by the Court before December 19, 2008 it is necessary for the Court to take this matter under submission based on the Petition without a hearing and rule before December 19, 2008 or to set this matter for hearing on or before December 19, 2008; and

Whereas, Plaintiffs and Defendant Ford Motor Company all request the granting of this Petition and do not contest this Petition;

Therefore it is stipulated by and between Plaintiffs Greg Pereyra by and through his guardian ad litem Hugo Pereyra and Defendant Ford Motor Company that the Petition to Approve Compromise of Disputed Claim of Adult Person with Disability may be submitted on the papers and ruled on on or before December 19, 2008 or, in the alternative, that said Petition may be set for hearing on or before December 19, 2008.

Dated:

Michael B. Moore, Esq., Attorney for Plaintiffs

Dated: December 12, 2000

Randall Haimovici, Esc.) Attorney for Defendant Ford Motor Company

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STIPULATION RE SUBMISSION OF PETITION TO APPROVE COMPROMISE OF DISPUTED CLAIM OF ADULT PERSON WITH A DISABILITY WITHOUT A HEARING OR, IN THE ALTERNATIVE, TO SCHEDULING A HEARING ON OR BEFORE DECEMBER 19, 2008

DECEMBER 19, 2008

CASE NO.: 08-01063-MMC