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8 Attorneys for Defendants
 9 AIG FINANCIAL PRODUCTS CORP. and
 AIG SUNAMERICA LIFE ASSURANCE COMPANY

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 COUNTY OF SAN MATEO,

Case No. CV 08-04751 MMC

13 Plaintiff,

14 v.

**STIPULATION AND ~~PROPOSED~~ ORDER
 CONTINUING DATE FOR CASE
 MANAGEMENT CONFERENCE**

16 BANK OF AMERICA, N.A., et al.

17 Defendants.
 18
 19

20 Pursuant to Civil Local Rules 6-2 and 7-12, this stipulation is entered into by and between
 21 plaintiff COUNTY OF SAN MATEO (the "County") and defendants AIG FINANCIAL PRODUCTS
 22 CORP. and AIG SUNAMERICA LIFE ASSURANCE COMPANY (the "AIG Defendants") through
 23 their respective counsel of record, based upon the following:

24 WHEREAS, in a stipulation filed on December 12, 2008 with this Court, the parties stipulated
 25 that no defendant need respond before March 16, 2009, to the amended complaint filed by plaintiffs on
 26 November 24, 2008,

27 WHEREAS, although the consent of defendants other than the AIG Defendants is not required
 28 because no defendant's position is compromised by this Stipulation, counsel for the AIG Defendants

1 can nevertheless report that identified counsel for the other defendants that have appeared in this action
2 have been canvassed and all support the Court's approval of this Stipulation;

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
4 parties, and the parties jointly move as follows:

5 1. That the Court extend the date for the case management conference, originally
6 scheduled for Friday, January 30, 2009, to Friday, March 27, 2009,

7 2. That the deadlines for submitting the case management conference statement, Rule
8 26(f) report, initial closures, the Alternative Dispute Resolution ("ADR") certificate and ADR
9 stipulation or Notice of Need for ADR phone conference, and any other documents with deadlines
10 dependent on the case management conference date be continued accordingly, and

11 3. No defense of any defendant to this action is prejudiced or waived by its submission of
12 this Stipulation, including but not limited to assertion of jurisdictional defenses.

13 4. Defense counsel may file notices of appearance in this action without prejudice to their
14 respective clients' jurisdictional and venue defenses.

15 The parties have previously stipulated that no defendant need respond to the County's amended
16 complaint before March 16, 2009. Dkt. No. 38. Thus, the parties believe that scheduling the case
17 management conference after that date will not adversely affect the scheduling in the case.

18 IT IS SO STIPULATED.

19 Dated: January 12, 2009

AKIN GUMP STRAUSS HAUER & FELD LLP

20 By _____ /s/
21 Reginald D. Steer

22 Attorneys for Defendants
23 AIG FINANCIAL PRODUCTS CORP. and
AIG SUNAMERICA LIFE ASSURANCE
COMPANY

24 Dated: January 12, 2009

COTCHETT, PITRE, & MCCARTHY

25 By _____ /s/
26 Nanci E. Nishimura

27 Attorneys for Plaintiff
28 COUNTY OF SAN MATEO

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2 Dated: January 14, 2009



Hon. Maxine M. Chesney

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