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

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 COUNTY OF CONTRA COSTA,

Case No. CV 08-04752 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 Pursuant to Civil Local Rules 6-2 and 7-12, this stipulation is entered into by and between  
 20 plaintiff COUNTY OF CONTRA COSTA (the “County”) and defendants AIG FINANCIAL  
 21 PRODUCTS CORP. and AIG SUNAMERICA LIFE ASSURANCE COMPANY (the “AIG  
 22 Defendants”) through their respective counsel of record, based upon the following:

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

26 WHEREAS, although the consent of defendants other than the AIG Defendants is not required  
 27 because no defendant’s position is compromised by this Stipulation, counsel for the AIG Defendants  
 28 can nevertheless report that identified counsel for the other defendants that have appeared in this action

1 have been canvassed and all support the Court's approval of this Stipulation;

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

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

6 2. That the deadlines for submitting the case management conference statement, Rule  
7 26(f) report, initial closures, the Alternative Dispute Resolution ("ADR") certificate and ADR  
8 stipulation or Notice of Need for ADR phone conference, and any other documents with deadlines  
9 dependent on the case management conference date be continued accordingly, and No defense of any  
10 defendant to this action is prejudiced or waived by its submission of this Stipulation, including but not  
11 limited to assertion of jurisdictional defenses.

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

14 The parties have previously stipulated that no defendant need respond to the County's amended  
15 complaint before March 16, 2009. Dkt. No. 36. Thus, the parties believe that scheduling the case  
16 management conference after that date will not adversely affect the scheduling in the case.

17 IT IS SO STIPULATED.

18 Dated: January 12, 2009

**AKIN GUMP STRAUSS HAUER & FELD LLP**

19 By \_\_\_\_\_ /s/  
20 Reginald D. Steer

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

23 Dated: January 12, 2009

**COTCHETT, PITRE, & MCCARTHY**

24 By \_\_\_\_\_ /s/  
25 Nanci E. Nishimura

26 Attorneys for Plaintiff  
27 COUNTY OF SAN MATEO  
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1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2 Dated: January 14, 2009

  
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Hon. Maxine M. Chesney

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