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6 Attorneys for All Defendants
 7 Except Credit Suisse Securities (USA) LLC and
 Morgan Stanley & Company Incorporated
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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN JOSE DIVISION

12 PLUMBERS AND PIPEFITTERS LOCAL
 13 UNION NO. 630 PENSION-ANNUITY
 TRUST FUND, Derivatively on Behalf of
 14 CENTURY ALUMINUM COMPANY,

15 Plaintiff,

16 vs.

17 JOHN C. FONTAINE, JACK E.
 THOMPSON, PETER C. JONES, ROBERT
 18 E. FISHMAN, JOHN P. O'BRIEN, WILLY
 R. STROTHOTTE, JARL BERNTZEN,
 19 CATHERINE Z. MANNING, LOGAN W.
 KRUGER, MICHAEL A. BLESS, WAYNE
 20 R. HALE, STEVE SCHNEIDER, CREDIT
 SUISSE SECURITIES (USA) LLC, and
 21 MORGAN STANLEY & CO.
 INCORPORATED,

22 Defendants,

23 - and -

24 CENTURY ALUMINUM COMPANY, a
 25 Delaware corporation,

26 Nominal Defendant.
 27

No. C-09-4963-JW

STIPULATION AND [PROPOSED] ORDER

Attached hereto: Proposed Order

1 **RECITALS**

2 1. Before Judge Illston are four class actions purportedly brought on behalf of
3 all persons who purchased or otherwise acquired the common stock of Century Aluminum
4 Company (“Century Aluminum”):

5 Case Name	Case No.	Filing Date
6 <i>Petzschke v. Century Aluminum Company, et al.</i>	C-09-01001-SI	March 9, 2009
7 <i>Abrams v. Century Aluminum Company, et al.</i>	C-09-01103-SI	March 12, 2009
8 <i>McClellan v. Century Aluminum Co., et al.</i>	C-09-01162-SI	March 17, 2009
9 <i>Hilyard v. Century Aluminum Co., et al.</i>	C-09-01205-SI	March 19, 2009

10 2. On April 15, 2009, Judge Illston entered an order pursuant to Civil Local
11 Rule 3-12 relating these class actions.

12 3. On September 8, 2009, Judge Illston entered an order consolidating these
13 four class actions under the name *In re Century Aluminum Company Securities Litigation*,
14 No. C-09-1001-SI (the “Consolidated Class Actions”).

15 4. On September 23, 2009, Judge Illston entered an order appointing lead
16 plaintiff and lead counsel for the Consolidated Class Actions.

17 5. On September 18, 2009, Judge Illston set a briefing and hearing schedule for
18 filing a consolidated complaint in the Consolidated Class Actions and moving to dismiss
19 that consolidated complaint; pursuant to the schedule, the consolidated complaint is to be
20 filed November 17, 2009, any motions to dismiss are to be filed January 15, 2010, and the
21 hearing on any motions to dismiss is to be March 5, 2010, at 9 a.m., with a case
22 management conference that afternoon at 2:30 p.m. (Pursuant to the Private Securities
23 Litigation Reform Act of 1995, discovery in the Consolidated Class Actions is stayed
24 pending resolution of defendants' motions to dismiss.)

25 6. On October 19, 2009, plaintiff Plumbers And Pipefitters Local Union No.
26 630 Pension-Annuity Trust Fund filed this shareholder derivative action (the “Derivative
27 Action”).

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