STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND [PROPOSED] ORDER

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Plaintiff Iron Workers Mid-South Pension Fund, nominal defendant PG&E Corporation, and defendants Christopher P. Johns, Kent M. Harvey, Dinyar B. Mistry, C. Lee Cox, Barry Lawson Williams, David R. Andrews, Barbara L. Rambo, Maryellen C. Herringer, Richard A. Meserve, Roger H. Kimmel, Lewis Chew, Peter A. Darbee, and David M. Lawrence hereby stipulate and agree, by and through their undersigned counsel of record, as follows:

WHEREAS, on August 3, 2015, the parties submitted to the Court a Joint Status Report;

WHEREAS, the Joint Status Report informed the Court of the status of the State Derivative Actions proceeding under the caption <u>PG&E San Bruno Fire Derivative Cases</u>, Case No. JCCP 4648-C, pending in the Superior Court of the State of California, County of San Mateo (the "State Court");

WHEREAS, in the Joint Status Report the parties requested that this action remain stayed pending resolution of the State Derivative Actions;

WHEREAS, on November 3, 2015, the Court issued an order reassigning this action to the Honorable Susan Illston for all further proceedings;

WHEREAS, on November 10, 2015, the Court issued a Clerk's Notice setting an Initial Case Management Conference for December 4, 2015, at 2:30 p.m.;

WHEREAS, counsel for defendants Barry Lawson Williams, David R. Andrews, Barbara L. Rambo, Maryellen C. Herringer, Richard A. Meserve, Roger H. Kimmel, Lewis Chew, and David M. Lawrence has a conflict on December 4, 2015 requiring counsel to be out-of-state; and

WHEREAS, the parties agree that the Initial Case Management Conference currently scheduled for December 4, 2015, should be continued;

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1	IT IS HEREBY STIPULATED AND AGREED among the undersigned parties that:	
2	The Initial Case Management Conference currently scheduled for December 4, 2015,	
3	should be continued to January 29, 2016, at 2:30 p.m.	
4	Dated: November 13, 2015	Respectfully submitted,
5		ROBBINS ARROYO LLP
6		s/ George C. Aguilar
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14		Attorneys for Plaintiff Iron Workers Mid-South Pension Fund
15		
16	Dated: November 13, 2015	LATHAM & WATKINS LLP
17		s/ James K. Lynch
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25		Attorneys for Nominal Defendant PG&E
26		Corporation
27		
28		- 2 -

1 2	Dated: November 13, 2015 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP	
3	s/ Amy S. Park	
4	Amy S. Park	
	Richard S. Horvath, Jr. 525 University Avenue, Suite 1400	
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9	Attorneys for Defendants Barry Lawson Williams,	
	David R. Andrews, Barbara L. Rambo, Maryellen C. Herringer, Richard A. Meserve, Roger H.	
10	Kimmel, Lewis Chew, and David M. Lawrence	
11		
12	Dated: November 13, 2015 McDERMOTT WILL & EMERY LLP	
13		
14	s/ A. Marisa Chun A. Marisa Chun	
	McDermott Will & Emery LLP	
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18	Steven S. Scholes (Admitted <i>pro hac vice</i>)	
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21	Attornous for Defendants Christopher D. Johns	
22	Attorneys for Defendants Christopher P. Johns, Kent M. Harvey, Dinyar B. Mistry, C. Lee Cox,	
23	Peter A. Darbee	
24	I, Amy S. Park, am the ECF User whose ID and password are being used to file this STIPULATION TO CONTINUE STATUS CONFERENCE AND [PROPOSED] ORDER. In	
25	compliance with Civil L.R. 5-1(i)(3), I hereby attest that George C. Aguilar, James K. Lynch,	
26	and A. Marisa Chun have concurred in this filing.	
27	s/ Amy S. Park	
28	AMY S. PARK	
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[PROPOSED] ORDER

The above STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE & [PROPOSED] ORDER is APPROVED. The Status Conference currently scheduled for December 4, 2015, is continued to January 29, 2016, at 2:30 p.m.

IT IS SO ORDERED.

Dated: 11/16/15

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HONORABLE SUSAN ILLSTON UNITED STATES DISTRICT JUDGE