

1 Robert A. Mittelstaedt (State Bar No. 60359)  
 ramittelstaedt@JonesDay.com  
 2 Caroline N. Mitchell (State Bar No. 143124)  
 cnmitchell@JonesDay.com  
 3 David L. Wallach (State Bar No. 233432)  
 dwallach@JonesDay.com  
 4 JONES DAY  
 555 California Street, 26th Floor  
 5 San Francisco, CA 94104  
 Telephone: 415.626.3939  
 6 Facsimile: 415.875.5700

7 Attorneys for Defendant  
 CHEVRON CORPORATION  
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9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN FRANCISCO DIVISION

13 **Foster Ogola, et al.,**

14 **Plaintiffs,**

15 **v.**

16 **Chevron Corporation,**

17 **Defendant.**

**Case No. 14-cv-00173-SC**

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

18  
 19 WHEREAS, pursuant to the Stipulation and Order entered by the Court on May 29, 2014  
 20 (ECF No. 33), the Initial Case Management Conference is scheduled for August 22, 2014 at  
 21 10:00 a.m.;

22 WHEREAS, pursuant to Rules 26(a)(1)(c) and 26(f) of the Federal Rules of Civil  
 23 Procedure, with an Initial CMC on August 22, 2014, the parties would be required to meet and  
 24 confer regarding the contents of the joint case management statement, initial disclosures and other  
 25 issues by August 1, with the Initial Case Management Conference Statement due August 8, 2014,  
 26 and with initial disclosures due August 15, 2014;

27 WHEREAS, on May 19, 2014, the Court granted Defendants Chevron Corp.'s and  
 28 Chevron U.S.A., Inc.'s (CUSA) Motion to Dismiss with leave to amend, holding, *inter alia*, that

1 the complaint did not plead a valid basis for holding defendants responsible for alleged torts of  
2 Chevron Nigeria Limited (CNL) or that plaintiffs incurred an injury-in-fact sufficient to give  
3 them standing to sue in federal court (ECF No. 30);

4 WHEREAS, plaintiffs filed the First Amended Complaint (FAC) on June 17, 2014,  
5 dropping CUSA and Chevron Investments Inc. as defendants and alleging a putative class action  
6 on behalf of a class of Nigerians residing in Bayelsa State, Nigeria;

7 WHEREAS, on July 3, 2014, defendant Chevron Corporation moved to dismiss and strike  
8 the FAC arguing, *inter alia*, that the named plaintiffs still have not alleged an injury-in-fact  
9 sufficient to establish standing or any valid basis for holding Chevron Corporation responsible for  
10 alleged torts by CNL, and that the FAC's new class allegations fail to plead a viable class action;

11 WHEREAS, defendant's motion to dismiss and to strike is noticed for hearing on August  
12 8, 2014, at 10:00 a.m.;

13 WHEREAS, the matters to be addressed in any Rule 26(f) meet and confer, case  
14 management conference statement and initial disclosures depend on the outcome of the motion to  
15 dismiss and strike and, in the interest of efficiency, the parties wish to defer those tasks until the  
16 pending motion to dismiss and strike is decided;

17 IT IS HEREBY STIPULATED that, subject to the Court's approval and pursuant to Rule  
18 26(a)(1)(C) of the Federal Rules of Civil Procedure and Local Rule 6-2, the Initial Case  
19 Management Conference shall be rescheduled for October 24, 2014, or such date as the Court  
20 deems appropriate to accommodate a ruling on the pending motion and, depending on the ruling,  
21 sufficient time thereafter for the parties to meet requirements under Rule 26(f) for conference and  
22 initial disclosures, if any.

23  
24 Dated: July 11, 2014

Jones Day

25  
26 By: /s/Robert A. Mittelstaedt  
Robert A. Mittelstaedt

27 Counsel for Defendant  
28 CHEVRON CORPORATION

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Dated: July 11, 2014

Rufus-Isaacs, Acland & Grantham LLP

By: /s/ Neil Fraser  
Neil Fraser

Counsel for Plaintiffs  
FOSTER OGOLA, ET AL.

Pursuant to Local Rule 5-1(i)(3), I, Robert A. Mittelstaedt, attest that concurrence in filing this document has been obtained from the other signatory.

Dated: July 11, 2014

JONES DAY

By: /s/ Robert A. Mittelstaedt  
Robert A. Mittelstaedt

Counsel for Defendants  
CHEVRON CORPORATION

PURSUANT TO THE FORGOING STIPULATION, IT IS SO ORDERED.

Dated: 07/23/2014

  
The Honorable Samuel Conti