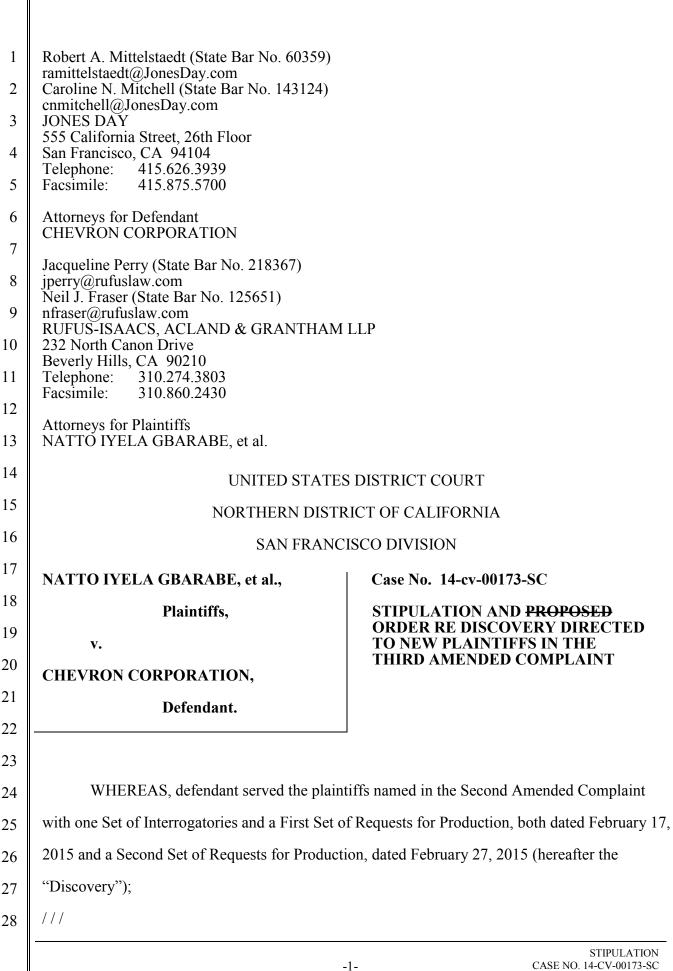
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1	WHEREAS, the Third Amended Complaint filed on June 1, 2015, among other things,
2	lists 11 additional plaintiffs whom plaintiffs' counsel contend were "drawn from the existing
3	plaintiffs in this case;"
4	WHEREAS, plaintiffs' counsel offered that they would treat the Discovery as if it were
5	served on those 11 persons on June 1, 2015, without the need for defendant to re-serve the
6	Discovery, and defendant accepted that offer without prejudice to its response to the Third
7	Amended Complaint and without conceding its propriety,
8	Now, therefore, the parties hereby stipulate as follows:
9	1. The Discovery identified above shall be deemed served as of June 1, 2015, on the 11
10	individuals referred to above.
11	2. This is without prejudice to defendant's rights and remedies with respect to filing of
12	the Third Amended Complaint and without prejudice to plaintiffs' position that the 11 plaintiffs
13	were named pursuant to stipulation dated March 15, 2015.
14	Pursuant to Local Rule 5-1(i)(3), I, Robert A. Mittelstaedt, attest that concurrence in filin
15	this document has been obtained from the other signatory.
16	Dated: June 18, 2015 Jones Day
17	Dry /a/ Dobart A. Mittalataadt
18	By: /s/ Robert A. Mittelstaedt Robert A. Mittelstaedt
19	Counsel for Defendant
20	CHEVRON CORPORATION
21	Dated: June 18, 2015 Rufus-Isaacs, Acland & Grantham LLP
22	By: /s/ Jacqueline Perry
23	Jacqueline Perry
24	Counsel for Plaintiffs NATTO IYELA GBARABE, et al.
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1	[PROPOSED] ORDER
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3	PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.
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5	Dated: _June 23, 2015
6	The Honorable Samuel Conti
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