

1 DAVID M. GLASPY, Esq. SBN 95332  
 2 [DGlaspy@mgmlaw.com](mailto:DGlaspy@mgmlaw.com)  
 3 **MANION GAYNOR & MANNING LLP**  
 4 One Walnut Creek Center  
 5 100 Pringle Avenue, Suite 750  
 6 Walnut Creek, CA 94596  
 7 Telephone: (925) 947-1300  
 8 Facsimile: (925) 947-1594  
 9 Attorneys for ROHR, INC.

8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10 JOSEPH THRASH, an individual; CHEZ  
 11 THRASH, an individual,  
 12 Plaintiff,

13 vs.

14 CIRRUS ENTERPRISES LLC, et al.  
 15 Defendants.

Case No. 3:17-cv-01501-JST

Transferred from Alameda Superior  
 Court RG17850130

Assigned to Hon. Jon S. Tigar

**STIPULATION AND ~~PROPOSED~~  
 ORDER REGARDING DEPOSITION  
 OF ROHR, INC.'S 30(b)(6) WITNESS**

Initially filed: February 21, 2017  
 Trial date: May 29, 2018

19 Due to scheduling conflicts, Defendant Rohr, Inc. ("Rohr") and Plaintiffs stipulate  
 20 that the deposition of Rohr's 30(b)(6) witness can go forward after the discovery deadline  
 21 currently set in this matter.

22 Counsel for Rohr, Inc. represents that each defendant in this matter (Goodyear Tire  
 23 and Rubber Company (erroneously sued as successor-in-interest to Goodyear Aerospace);  
 24 Honeywell International, Inc.; The Boeing Company; Lockheed Martin Corporation;  
 25 Henkel Corporation; IMO Industries; and United Technologies Corporation) has been  
 26 made aware of this proposed stipulation and each has responded that it does not object.

27 The filing party attests that all other signatories listed, and on whose behalf the filing  
 28 is submitted, concur in the filing's content and have authorized the filing.

