

1 H. GRANT LAW (SBN: 144505)
hlaw@shb.com
 2 AMIR NASSIHI (SBN: 235936)
anassih@shb.com
 3 SHOOK, HARDY & BACON L.L.P.
 333 Bush Street, Suite 600
 4 San Francisco, California 94104-2828
 Telephone: 415.544.1900
 5 Facsimile: 415.391.0281

6 Attorneys for Defendant
 FORD MOTOR COMPANY

7 DANIEL DELL'OSSO (SBN: 118203)
ddo@brandilaw.com
 8 LAW OFFICES OF THOMAS J. BRANDI
 9 354 Pine Street, Third Floor
 10 San Francisco, CA 94104
 Telephone: 415.989.1800
 11 Facsimile: 415.989.1801

12 Kevin F. Quinn, Esq. (SBN: 106224)
quinn@tbmlawyers.com
 13 TORNSNES BARTOLOTTA MCGUIRE
 2550 Fifth Avenue, Suite 1100
 14 San Diego, CA 92103
 Telephone: 619.236.9363
 15 Facsimile: 619.236.9653

16 Attorney for Plaintiff
 DAX PIERSON

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA

| | | |
|---------------------|---|--|
| DAX PIERSON, |) | Case No. CV-06-06503 PJH |
| |) | |
| Plaintiff, |) | |
| |) | JOINT MOTION AND STIPULATION TO |
| vs. |) | STAY JUDGMENT; [PROPOSED] ORDER |
| |) | |
| FORD MOTOR COMPANY, |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

25 Plaintiff Dax Pierson and Defendant Ford Motor Company have met and conferred with
 26 respect to staying the judgment and execution or enforcement thereof, pending conclusion of post-
 27 trial and appellate proceedings in this matter. Although Fed. R. Civ. Proc. Rule 62(a)'s 10 day stay
 28

1 after entry of judgment falls on September 1, 2009, Parties have agreed that Ford may post its bond
2 of \$15,227,000, by September 4, 2009. The judgment and execution or enforcement thereof are
3 stayed until the conclusion of post-trial and appellate proceedings in this matter, as if Ford's bond
4 was approved by this Court before September 1, 2009.

5
6 Date: August 25, 2009

Respectfully Submitted,

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8 SHOOK, HARDY & BACON, L.L.P.

9 By: /s/ H. Grant Law
10 H. GRANT LAW
11 Attorney for Defendant
12 FORD MOTOR COMPANY

13 THE BRANDI LAW FIRM.

14 By: /s/ Kevin F. Quinn
15 KEVIN F. QUINN,
16 Attorney for Plaintiff
17 DAX PIERSON

18 **[PROPOSED] ORDER**

19 Pursuant to stipulation, the Court hereby orders the following:
20 Enforcement or execution of the judgment in this matter are hereby stayed pending
21 conclusion of post-trial and appellate proceedings, subject to Ford posting its bond by September 4,
22 2009.

23 **IT IS SO ORDERED.**

24 DATED: 8/26/09

