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7 Attorneys for Defendants
 CHEVRON U.S.A. INC. and
 8 CHEVRON CORPORATION

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

12 NORTHERN CALIFORNIA RIVER
 WATCH, a non-profit corporation,

13 Plaintiff,

14 vs.

15 CHEVRON U.S.A. INC., CHEVRON
 16 CORPORATION, and DOES 1-10,
 Inclusive,

17 Defendants.
 18

Case No. 4:09-cv-00669-CW

**THIRD JOINT STIPULATION AND
 ORDER TO CONTINUE INITIAL
 DISCLOSURE AND CASE
 MANAGEMENT CONFERENCE
 DATES; SECOND JOINT
 STIPULATION AND [PROPOSED]
 ORDER FOR EXTENSION OF
 DEADLINE FOR CONDUCTING
 PRIVATE ADR; DECLARATION OF
 ROBERT C. GOODMAN IN SUPPORT
 THEREOF**

21 **DECLARATION OF ROBERT C. GOODMAN**

22 1. I am a shareholder at the law firm of Rogers Joseph O'Donnell,
 23 attorneys for Defendants Chevron U.S.A. Inc. and Chevron Corporation. I know the
 24 following facts on my own personal knowledge and if called upon could and would
 25 competently testify thereto.
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27 2. This action was filed on February 13, 2009 and Defendants answered
 28 the complaint on May 7, 2009. A Case Management Conference ("CMC") was originally set

1 for June 23, 2009.

2 3. On June 3, 2009, Counsel for the parties submitted a Joint Stipulation
3 and [Proposed] Order to Continue Initial Disclosure and Case Management Conference
4 Dates. The Court signed the Order on June 10, 2009, continuing the Case Management
5 Conference to August 25, 2009, at 2:00 p.m., and setting the last date for completing initial
6 disclosures to August 18, 2009.

7 4. On August 14, 2009, Counsel for the parties submitted a Second Joint
8 Stipulation and [Proposed] Order to Continue Initial Disclosure and Case Management
9 Conference Dates. The Court signed the Order on August 14, 2009, continuing the Case
10 Management Conference to November 17, 2009 at 2:00 p.m., and setting the last for
11 completing initial disclosures to October 27, 2009.

12 5. On June 2, 2009, Counsel for the parties submitted a Stipulation and
13 [Proposed] Order Selecting ADR Process. The Court signed the Order on June 4, 2009,
14 setting the deadline for completing a Private ADR session for October 5, 2009.

15 6. On September 10, 2009, Counsel for the parties submitted a Stipulation
16 for Extension of Deadline for Conducting Mediation [Proposed] Order. The Court signed the
17 Order on September 15, 2009, setting the deadline for completing a Private ADR session for
18 November 11, 2009.

19 7. The parties immediately thereafter scheduled a Private ADR session
20 with William L. Nagle for November 11, 2009 at 9:30 a.m., the earliest date on which the
21 mediator and all parties were available. Due to scheduling issues, it is not possible to
22 commence mediation on November 11, and the parties, and mediator, have agreed to delay
23 the mediation by one (1) week, and commence mediation on November 18, 2009.

24 8. The parties believe an additional brief continuance of the Case
25 Management Conference, and the other deadlines tied to the Case Management Conference
26 date, is appropriate so that the parties can focus their attention on resolving this matter.

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(c) That the deadline for completing a Private ADR session be extended to
November 18, 2009.



Dated: November _5_, 2009

HONORABLE CLAUDIA WILKEN
United States District Court Judge