Forouhar v.	Statoil, ASA	Doc. 73	
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8	The state of the s		
9			
10	UNITED STATES DISTRICT COURT		
11	NORTHERN DISTRICT OF CALIFORNIA		
12	OAKLAND DIVISION		
13			
14	MITRA N. FOROUHAR,	) Case No. 10-3623 (SBA)	
15	Plaintiff,	) )	
16	v.	JOINT STIPULATION AND ORDER CONCERNING STATOIL ASA'S	
17	STATOIL ASA,	ADMINISTRATIVE MOTION	
18	Defendant.	(SPECIALLY APPEARING DEFENDANT STATOIL ASA'S ADMINISTRATIVE	
19		MOTION AND DECLARATION OF LAURA KABLER OSWELL FILED	
20		CONCURRENTLY HEREWITH]	
21		Judge: The Hon. Saundra B. Armstrong Courtroom: 1	
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SULLIVAN & CROMWELL LLP	IOINIT CTIDIU ATION	AND [PROPOSED] ORDER CONCERNING ADMINISTRATIVE MOTION	
	JOINT STIPULATION	CASE No. 10-3623 (SBA) Dockets. Justia	

1	WHEREAS, on February 22, 2011, Plaintiff Mitra N. Forouhar filed Plaintiff's
2	Objections to Defendant Statoil's Reply Declarations (Dkt. 62) ("Objections") and the Supplemental
3	Declaration of Jon F. Claudi in Support of Plaintiff's Opposition to Defendant's Motion to Dismiss and
4	Plaintiff's Objections to Defendant's Reply Declarations (Dkt. 64) ("Supplemental Claudi Declaration")
5	in connection with briefing on Specially Appearing Defendant Statoil ASA's ("Statoil's") Motion to
6	Dismiss the Complaint (Dkt. 16);
7	WHEREAS, on March 9, 2011, Statoil filed an Administrative Motion Requesting Leave
8	to File its Response to Plaintiff's Objections to Reply Declarations ("Administrative Motion") pursuant
9	to Local Rule 7-11 that requested the Court to permit Statoil to file a response to the Objections and
10	Supplemental Claudi Declaration, and filed a copy of its Response to Plaintiff's Objections to Reply
11	Declarations ("Response") as Exhibit A to the Declaration of Laura Kabler Oswell;
12	WHEREAS, without waiving any rights with respect to the Objections or the
13	Supplemental Claudi Declaration, Plaintiff Mitra Forouhar does not oppose Statoil's Administrative
14	Motion;
15	WHEREAS Plaintiff Mitra Forouhar contends that she should be allowed to file the
16	Supplemental Claudi Declaration in response to matters raised in Statoil's reply papers and intends to
17	file an administrative motion requesting leave to file the Supplemental Claudi Declaration;
18	WHEREAS, having already addressed the propriety of the filing of the Supplemental
19	Claudi Declaration in its Response, Statoil does not intend to file any further opposition to the filing of
20	the Supplemental Claudi Declaration;
21	NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties,
22	through their undersigned counsel, as follows:
23	1. Statoil may file its Response.
24	IT IS SO STIPULATED.
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1 2		CHONBRUN DESIMONE SEPLOW ARRIS HOFFMAN & HARRISON, LLP	
3	PA PA	AUL L. HOFFMAN ICHAEL D. SEPLOW	
4		/s/ Michael D. Seplow	
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8	At	torneys for Plaintiff	
9	DATED: March 9, 2011	JLLIVAN & CROMWELL LLP	
10	BF	RENDAN P. CULLEN	
11		AURA KABLER OSWELL CHYUT J. PHADKE	
12		/s/ Brendan P. Cullen	
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16	Title 1	torneys for Specially Appearing Defendant atoil ASA	
17	I, Brendan P. Cullen, am the ECF user wh	ose ID and password are being used to file this	
18	Joint Stipulation and [Proposed] Order Concerning Stato		
19			
20	compliance with General Order No. 45, X.B., I hereby attest that Michael D. Seplow has concurred in		
21	this filing.		
22		/s/Brendan P. Cullen	
23		Brendan P. Cullen	
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28	- 2 - JOINT STIPULATION AND [PR	OPOSED] ORDER CONCERNING ADMINISTRATIVE MOTION	

1	ORDER		
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3	THE FOREGOING STIPULATION IS APPROVED. NOW, THEREFORE, IT IS		
4	ORDERED, ADJUDGED, AND DECREED:		
5	Statoil's Administrative Motion is GRANTED;		
6	2. Statoil's Response is FILED with the Court.		
7	IT IS SO ORDERED.		
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10	Dated: _3/15/11 THE HONORABLE SAUNDRA B. ARMSTRONG		
11	UNITED STATES DISTRICT JUDGE		
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JOINT STIPULATION AND [PROPOSED] ORDER CONCERNING ADMINISTRATIVE MOTION CASE NO. 10-3623 (SBA)