

**MAUNE.RAICHLE.HARTLEY.FRENCH & MUDD, LLC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MICHAEL R. MARCUS and VICTORIA L. MARCUS,

Plaintiffs,

vs.

AIR & LIQUID SYSTEMS CORPORATION,  
*et al.*,

Defendants.

Case No.: 4:22-cv-09058-HSG

[Alameda County Superior Court Case No.:  
22CV021840]

**STIPULATION TO EXTEND  
JURISDICTION OVER  
CONDITIONALLY DISMISSED  
DEFENDANT WARREN PUMPS, LLC;  
ORDER**

Courtroom: 02, 4<sup>th</sup> Floor  
District Judge: Hon. Haywood S. Gilliam Jr.

Filed in State Court: November 15, 2022  
Removed to NDCA: December 21, 2022  
Trial Date: September 9, 2024.

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that Plaintiffs Michael R. Marcus and Victoria L. Marcus  
3 (“Plaintiffs”) and WARREN PUMPS, LLC (“Defendant”) hereby stipulate as follows:

4 1. On November 15, 2022, Plaintiffs filed their Complaint for Personal Injury and Loss  
5 of Consortium – Asbestos in the Superior Court of the State of California, Couty of Alameda  
6 Case No. 22CV021840.

7 2. On December 21, 2022, the above action was removed to the United States District  
8 Court, Northern District of California, Case No. 4:22-09058.

9 3. On August 12, 2024, Plaintiffs and Defendant reached an agreement of all claims in  
10 this action.

11 4. On August 12, 2024, the Court granted an oral motion for a conditional dismissal with  
12 prejudice as to Warren Pumps, LLC, with the Court retaining jurisdiction for 45 days.

13 5. While all terms of settlement are agreed upon, the terms of settlement are not yet  
14 perfected. Plaintiffs and Defendant agree that this matter should not be litigated due to the  
15 agreed-upon resolution.

16 6. Therefore, Plaintiffs and Defendant stipulate and request that this Court retain  
17 jurisdiction over the matter as it pertains to Defendant Warren Pumps, LLC, for an additional  
18 forty-five (45) days.

19 DATED: September 25, 2024

Maune Raichle Hartley French & Mudd LLC

20 By:  \_\_\_\_\_

21 Rabiah N. Oral  
22 Attorney for Plaintiffs

23 DATED: September 25, 2024

Tucker Ellis, LLP


24 By: \_\_\_\_\_

25 James P. Cunningham  
26 Attorney for Warren Pumps, LLC

**LOCAL RULE 5-1(i)(3) SERVICE AND FILING OF PLEADINGS AND OTHER PAPERS**

In accordance with L.R5-1(i)(3), I, Rabiah N. Oral, attest that all signatories identified above, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: September 25, 2024

By:   
Rabiah N. Oral, Esq.  
Attorney for Plaintiffs

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**ORDER**

Having read and considered the foregoing stipulation of parties, and good cause appearing:

PURSUANT TO STIPULATION, IT IS SO ORDERED that the terms of settlement between PLAINTIFFS and Defendant WARREN PUMPS, LLC are to be perfected within forty-five (45) days of this order. The Court retains jurisdiction over the matter as it pertains to Defendant WARREN PUMPS, LLC, for forty-five (45) days from the date of this order.

IT IS SO ORDERED.

DATED: 9/26/2024

  
Hon. Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT COURT JUDGE