

E-Filed 5/8/09

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14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN JOSE DIVISION

17 RICHARD T. THIERIOT, an individual,)	Case No.: C-07-05069 JW RS
)	
18 Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	TO EXTEND TIME TO SUBMIT REPORT
19 v.)	<u>PURSUANT TO APRIL 29, 2009 HEARING</u>
)	
20 AIG MATCHED FUNDING CORP., a)	
21 corporation, et. al.,)	
)	
22 Defendants.)	

23
 24 IT IS HEREBY STIPULATED by and among the parties to this action through their
 25 counsel of record as follows:

26 WHEREAS, a hearing on the parties' Motions to Compel was heard on April 29, 2009
 27 before Magistrate Judge Seeborg, and at the hearing Judge Seeborg directed the parties to
 28 continue meet and confer efforts and submit a report of unresolved issues on May 6, 2009;

STIPULATION & ~~PROPOSED~~ ORDER TO EXTEND TIME TO SUBMIT REPORT
 (Case No. C-07-5069 JW RS)

1 WHEREAS, counsel for the parties have continued meet and confer efforts based upon
2 the guidance Judge Seeborg provided on April 29, 2009 and counsel for parties have reached
3 agreement on a number of their discovery disputes, including production of James Kleier
4 invoices through November 2005, production of certain deposition transcripts in AIG's
5 possession, and the production of certain summary information about other AIG transactions;

6 WHEREAS, three depositions and a mediation in this case are scheduled over the course
7 of this week and next week;

8 WHEREAS, several discovery disputes remain outstanding but will likely be resolved
9 with further meeting and conferring;

10 AND WHEREAS, the parties have not previously requested any extension of time to file
11 the report of outstanding discovery issues and this extension will not otherwise affect the
12 schedule for the case.

13 IT IS HEREBY STIPULATED and the parties request that the Court order the following:
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1 1. The time for the parties to submit their report, pursuant to Judge Seeborg's
2 instructions at the April 29, 2009 hearing, is extended through and including May 18, 2009.

3 Dated: May 5, 2009

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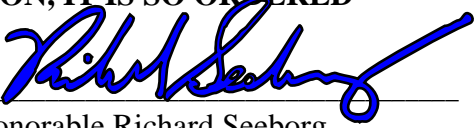
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20 *Attorneys for Defendants*
21 *AIG Funding Corp., AIG Financial Securities*
22 *Corp., AIG Financial Products Corp., and*
23 *Banque AIG*

24 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

25 Dated: 5/8/09, ~~2009~~

26 _____
27 
28 The Honorable Richard Seeborg
 United States Magistrate Judge