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 12 AIG MATCHED FUNDING CORP.,
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 and BANQUE AIG

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

19 RICHARD T. THIERIOT, an individual,
 20 Plaintiff,

v.

22 AIG MATCHED FUNDING CORP., et
 23 al.,

24 Defendants.

Case No. C-07-05069 JW RS

Action Filed: October 7, 2007

SECOND JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND
 TIME TO SUBMIT REPORT
 PURSUANT TO APRIL 29, 2009
 HEARING

Dep't: Courtroom 8, 4th Floor
 Judge: Honorable Richard Seeborg

1 Plaintiff Richard T. Thieriot and defendants AIG Matched Funding Corp., AIG
2 Financial Securities Corp., AIG Financial Products Corp., and Banque AIG, through their
3 respective counsel of record, hereby stipulate and agree as follows:

4 WHEREAS, a hearing on the parties' Motions to Compel was heard on April 29,
5 2009 before the Honorable Magistrate Judge Seeborg, and at the hearing Judge Seeborg
6 directed the parties to continue meet and confer efforts and submit a report of unresolved
7 issues on May 6, 2009;

8 WHEREAS, on May 5, 2009 parties submitted a Stipulation and Proposed Order to
9 Extend Time to Submit Report requesting that the parties submit their joint report on May
10 18, 2009 and Judge Seeborg so ordered the Stipulation and Proposed Order on May 8,
11 2009;

12 WHEREAS, on May 6, 2009, and prior to receiving Judge Seeborg's ruling above,
13 the parties submitted a Joint Report on Discovery Disputes describing the parties'
14 continued meet and confer efforts, setting forth those issues that had been resolved and
15 those issues that remained unresolved as of that date and reiterating the parties' request for
16 an extension through May 18, 2009 to submit a joint report;

17 WHEREAS, on May 13, 2009 parties participated in a private mediation of this
18 matter before the Honorable Layn Phillips (Ret.);

19 WHEREAS, on May 14, 2009 parties submitted a Joint Stipulation and Proposed
20 Order Modifying Case Schedule to Judge Ware requesting a four week extension of the
21 existing case deadlines in order to further explore settlement of this matter;

22 WHEREAS, parties believe that the extension of the existing case deadline and this
23 extension of the deadline to file a report of outstanding issues will allow the parties to
24 direct litigation costs and efforts towards a potential resolution of this matter;

25 WHEREAS, parties have previously requested one extension to the deadlines to
26 submit a report of unresolved issues and this further extension will not otherwise affect
27 the schedule of the case;

28 IT IS HEREBY STIPULATED and the parties request that the Court order the

1 following:

2 1. The time for the parties to submit their report of unresolved discovery
3 issues, pursuant to Judge Seeborg's instructions at the April 29, 2009 hearing, is extended
4 through and including June 22, 2009.

5 Dated: May __, 2009

6 LUKENS LAW GROUP
7 WILLIAM M. LUKENS
8 JENNIFER L. JONAK
9 MAUREEN MCGUIRL

10 By: _____
11 Maureen McGuirl
12 Attorneys for Plaintiff
13 RICHARD T. THERIOT

14 Dated: May 18, 2009

15 DECHERT LLP
16 NICOLLE L. JACOBY
17 JOSEPH J. LAVIN
18 H. JOSEPH ESCHER III
19 FRANCE JAFFE

20 By: _____ /s/
21 H. Joseph Escher III
22 Attorneys for Defendants
23 AIG MATCHED FUNDING CORP.,
24 AIG FINANCIAL SECURITIES CORP.,
25 AIG FINANCIAL PRODUCTS CORP.,
26 and BANQUE AIG

27 IT IS SO ORDERED.

28 Dated: May 19, 2009



The Honorable Richard Seeborg
UNITED STATES MAGISTRATE JUDGE

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