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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION**

RICHARD T. THIERIOT, an individual,  
  
 Plaintiff,

v.

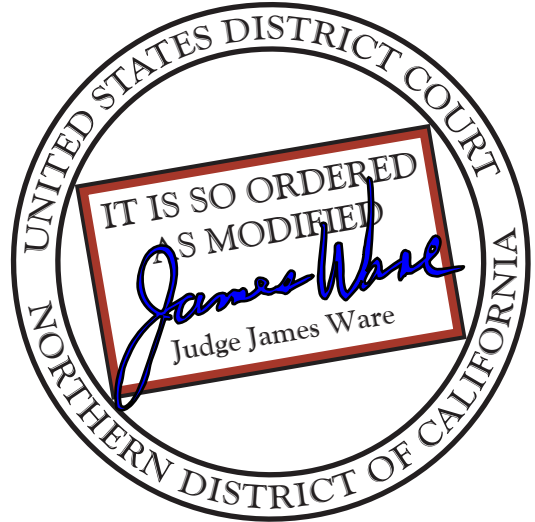
AIG MATCHED FUNDING CORP., AIG  
 FINANCIAL SECURITIES CORP., AIG  
 FINANCIAL PRODUCTS CORP.,  
 BANQUE AIG, and DOES ONE through  
 THIRTY, inclusive,

Defendants.

Case No. 07-5069 JW (RS)

**JOINT STIPULATION AND  
 [PROPOSED] ORDER  
 MODIFYING CASE SCHEDULE  
 TO ALLOW FOR FURTHER  
 SETTLEMENT DISCUSSIONS**

Courtroom 8, 4<sup>th</sup> Floor  
 Judge: The Hon. James Ware



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

4 WHEREAS, the parties have diligently pursued discovery in keeping with the  
5 Court’s existing deadlines in this case;

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

8 WHEREAS, the parties have committed to continuing their efforts to resolve the  
9 dispute which is the subject of this action and to that end have agreed to stay their  
10 litigation activities for approximately one month to focus their efforts on resolution of this  
11 matter;

12 WHEREAS, counsel for the parties believe that a four week extension of the  
13 existing deadlines will allow them to maximize their clients’ attempts to resolve this  
14 matter, and in good faith, request that the Court consider this modest extension of the  
15 schedule so as to direct litigation costs and efforts towards resolution;

16 IT IS HEREBY STIPULATED and the parties request that the Court modify the  
17 current Scheduling Order to accommodate the settlement effort as follows :

18

	Current Date	Proposed Date
19 Close of Discovery	July 6, 2009	August 3, 2009
20 Last Day for Hearing Dispositive Motions	Sept. 14, 2009	<b>October 5, 2009</b>
21 Preliminary Pretrial Conference	June 8, 2009	<b>July 6, 2009</b>
22 Preliminary Pretrial Conference Statements	May 29, 2008	June 26, 2009

23  
24

25 The Parties have previously requested that the current scheduling order be  
26 modified to permit a brief period of time to make expert witness disclosures. The  
27 modification to the scheduling order proposed herein will affect other deadlines insofar as  
28

1 those dates are tied to the close of discovery, but the parties have attempted to make this  
2 stay and extension as modest as possible so as to minimize the impact on the case  
3 schedule and on the Court.

4 Dated: May 14, 2009

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7  
8 By: /s/ Jennifer L. Jonak  
9 *Attorneys for Plaintiff Richard T. Thieriot*

10 Dated: May 14, 2009

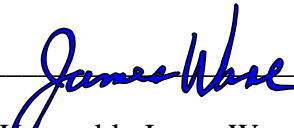
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13 By: /s/  
14 H. JOSEPH ESCHER III  
15 *Attorneys for Defendants AIG Matched*  
16 *Funding Corp., AIG Financial Securities*  
17 *Corp., AIG Financial Products Corp., and*  
18 *Banque AIG*

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20 The Court is encouraged that the parties are in settlement discussion. In their  
21 Joint Conference Statement for the July 6, 2009 hearing, the parties shall update  
the Court in their efforts.

22 Dated: May 20, 2009

23   
24 The Honorable James Ware  
25 United States District Judge  
26  
27  
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