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5 Attorneys for Plaintiff
 6 Chubb Custom Insurance Company

7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT, CALIFORNIA**

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 11 CHUBB CUSTOM INSURANCE)
 COMPANY, for itself and as subrogee of,)
 12 and in the name of TAUBE-KORET)
 CAMPUS FOR JEWISH LIFE,)
 13 Plaintiff,)
 14 v.)
 15 SPACE SYSTEMS/LORAL, INC., a)
 Delaware corporation, directly and as)
 16 successor in interest to FORD)
 AEROSPACE & COMMUNICATIONS)
 17 CORPORATION, FORD MOTOR)
 18 COMPANY, a Delaware corporation, as)
 predecessor in interest to FORD)
 19 AEROSPACE & COMMUNICATIONS)
 CORPORATION, SUN)
 20 MICROSYSTEMS, INC., a Delaware)
 corporation, CHEVRON)
 21 CORPORATION, a Delaware corporation,)
 and HARMAN STEVENSON INC., a)
 22 California corporation, dba KFC,)
 23 Defendants.)

Case No.: C 09-4485 JF (PVT)

**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE THE CASE
 MANAGEMENT CONFERENCE AND
 INITIAL DISCLOSURES OF THE
 PARTIES PURSUANT TO FED. R.
 CIV. P. 26(f)(3)(A) AND LOCAL RULE
 6-2.**

1 WHEREAS, on July 23, 2010, plaintiff Chubb Custom Insurance Company ("Plaintiff")
2 filed a Second Amended Complaint against Defendants Ford Motor Company ("Ford Motor"),
3 Chevron Corporation ("Chevron"), Sun Microsystems, Inc. ("Sun"), Harman-Stevenson, Inc.
4 ("Harman/KFC"), and Space Systems/Loral, Inc. ("SS/L");

5 WHEREAS, Plaintiff agreed to extend the deadline for Defendants Ford Motor, Chevron,
6 Sun and Harman/KFC to respond to the Second Amended Complaint up to and including
7 September 8, 2010;

8 WHEREAS, Plaintiff agreed to further extend the deadline for Defendants Sun and
9 Harman/KFC to respond to the Second Amended Complaint up to and including September 22,
10 2010;

11 WHEREAS, Defendants Chevron and Ford Motor intend to file motions to dismiss or
12 strike and have reserved a hearing date of October 29, 2010;

13 WHEREAS, the parties have agreed, subject to the Court's approval and scheduling order,
14 to continue the current date of the Case Management Conference to coincide with the reserved
15 hearing date of October 29, 2010.

16 WHEREAS, the parties have agreed, subject to the Court's approval and scheduling order,
17 to postpone their respective initial disclosures and discovery until after the Case Management
18 Conference.

19 NOW THEREFORE, pursuant to Local Rules 6-2 and 7-12, the parties to this action, by
20 and through their undersigned counsel, hereby stipulate and agree that the above deadlines be
21 continued, subject to the Court's approval and scheduling order, as follows:

- 22 1. The Case Management Conference is continued to October 29, 2010; and
- 23 2. The parties' Fed. R. Civ. P. Rule 26(f) conference is continued to November 30,
24 2010.

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1 Dated: September 9, 2010

2 CHAMBERLIN KEASTER & BROCKMAN LLP

3 / s / Penelope S. Park

4 By _____
5 Kirk C. Chamberlin
6 Penelope S. Park
7 Attorneys for Plaintiff
8 Chubb Custom Insurance Company

9 Dated: September 9, 2010

10 SHOOK HARDY & BACON LLP

11 / s / Kevin T. Haroff

12 By _____
13 Kevin T. Haroff
14 Katherine A. Wolf
15 Attorneys for Defendant
16 Ford Motor Company

17 Dated: September 9, 2010

18 ROGERS JOSEPH O'DONNELL

19 / s / Robert C. Goodman

20 By _____
21 Robert C. Goodman
22 Ann M. Blessing
23 D. Kevin Shipp
24 Attorneys for Defendant
25 Chevron Corporation

26 Dated: September 9, 2010

27 PAUL, HASTINGS, JANOFSKY & WALKER LLP

28 / s / Alexander M.R. Lyon

By _____
David M. Walsh
Geoffrey T. Stover
Alexander M.R. Lyon
Attorneys for Defendant
Space Systems/Loral, Inc.

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1 Dated: September 9, 2010

2 HOLME ROBERTS & OWEN LLP

3 / s / Katheryn Coggon

4 By _____
5 Linnea Brown
6 Katheryn Coggon
7 Attorneys for Defendant
8 Sun Microsystems, Inc.

9 Dated: September 9, 2010

10 MCKAY, BURTON & THURMAN

11 / s / David J. Bird

12 By _____
13 David J. Bird
14 Bruce J. Boehm
15 Nickolas S. Rice
16 Attorneys for Defendant
17 Harman-Stevenson, Inc.

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1 Pursuant to Local Rule 6-2(a) I attest that the above stipulation sets forth the reasons for
2 the requested continuance, that all previous time modifications in the case, whether by stipulation
3 or Court order have been disclosed. Further, the above requested continuance will not unduly
4 effect the schedule for the case in light of the anticipated motions to dismiss or strike Plaintiff's
5 Second Amended Complaint filed by Defendants Chevron and Ford Motor.

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7 Dated: September 9, 2010

8 CHAMBERLIN KEASTER & BROCKMAN LLP

9 / s / Penelope S. Park

10 By _____
11 Kirk C. Chamberlin
12 Penelope S. Park
13 Attorneys for Plaintiff
14 Chubb Custom Insurance Company

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19 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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21 Dated: September 9, 2010

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23 JEREMY FOGEL
24 United States District Judge
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