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5 Attorneys for Plaintiff  
 6 Chubb Custom Insurance Company

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

10  
 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 )  
 16 Delaware corporation, directly and as )  
 successor in interest to FORD )  
 17 AEROSPACE & COMMUNICATIONS )  
 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. )  
 )  
 24 \_\_\_\_\_ )  
 )  
 25 )  
 26 )  
 27 )  
 28 )

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

**[PROPOSED] STIPULATION 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 January 15, 2010, the Court continued the Case Management Conference  
2 to May 28, 2010, at 10:30 a.m.;

3 WHEREAS, on March 25, 2010, plaintiff Chubb Custom Insurance Company  
4 ("Plaintiff") filed a First Amended Complaint against Defendants Ford Motor Company ("Ford  
5 Motor"), Chevron Corporation ("Chevron"), Sun Microsystems, Inc. ("Sun"), Harman-Stevenson,  
6 Inc. ("Harman/KFC"), and Space Systems/Loral, Inc. ("SS/L");

7 WHEREAS, the parties agreed to extend the deadline for Defendants Ford Motor,  
8 Chevron, Sun, Harman/KFC, and SS/L to respond to the First Amended Complaint to and  
9 including May 3, 2010, and subsequently agreed to further extend Defendant Harman/KFC's  
10 deadline to respond to the First Amended Complaint to and including May 13, 2010;

11 WHEREAS, on May 3, 2010, Defendant Space Systems/Loral, Inc. filed an Answer to  
12 Plaintiff's First Amended Complaint, while Defendants Ford Motor, Chevron and Sun, filed  
13 motions to dismiss or strike Plaintiff's First Amended Complaint and noticed the hearing on  
14 Defendants' motions for June 18, 2010, at 9:00 a.m.

15 WHEREAS, on May 6, 2010, the parties participated in the Fed. R. Civ. P. Rule 26(f)  
16 conference.

17 WHEREAS, the parties have agreed, subject to the Court's approval and scheduling order,  
18 to continue the current date of the Case Management Conference to coincide with the hearing on  
19 Defendants' motions on June 18, 2010.

20 WHEREAS, Plaintiff and Defendants Ford Motor, Chevron, Sun and Harman/KFC have  
21 agreed, subject to the Court's approval and scheduling order, to postpone their respective initial  
22 disclosures and discovery until after the Case Management Conference.

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

- 4 1. The Case Management Conference is continued to June 18, 2010; and
- 5 2. The parties' Fed. R. Civ. P. Rule 26(f) conference is continued to July 25, 2010.

6  
7 Dated: May 10, 2010

8 CHAMBERLIN KEASTER & BROCKMAN LLP

9 / s / Lyndon H. Hong

10 By \_\_\_\_\_

Kirk C. Chamberlin  
Lyndon H. Hong  
Penelope S. Park

11 Attorneys for Plaintiff  
12 Chubb Custom Insurance Company

13  
14 Dated: May 10, 2010

15 SHOOK HARDY & BACON LLP

16 / s / Kevin T. Haroff

17 By \_\_\_\_\_

18 Kevin T. Haroff  
19 Katherine A. Wolf  
Attorneys for Defendant  
20 Ford Motor Company

21 Dated: May 10, 2010

22 ROGERS JOSEPH O'DONNELL

23 / s / Robert C. Goodman

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

25 Robert C. Goodman  
26 Ann M. Blessing  
D. Kevin Shipp  
Attorneys for Defendant  
27 Chevron Corporation



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 motions to dismiss or strike Plaintiff's First  
5 Amended Complaint filed by defendants Ford Motor Company, Chevron Corporation and Sun  
6 Microsystems, Inc.

7  
8 Dated: May 10, 2010

9 CHAMBERLIN KEASTER & BROCKMAN LLP

10 / s / Lyndon H. Hong  
11 By \_\_\_\_\_  
12 Kirk C. Chamberlin  
13 Lyndon H. Hong  
14 Attorneys for Plaintiff  
15 Chubb Custom Insurance Company

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20 PURSUANT TO STIPULATION, IT IS SO ORDERED:

21  
22 Dated: May 12, 2010

23 \_\_\_\_\_  
24 JEREMY FOGEL  
25 United States District Judge  
26  
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