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7 Attorneys for Defendants
8 LOCKHEED MARTIN CORPORATION
and LOCKHEED MARTIN
9 CORPORATION SALARIED EMPLOYEE
RETIREMENT PROGRAM

10 UNITED STATES DISTRICT COURT

11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 ANDREW J. NALBANDIAN, JR., an
13 individual; GREGORY M. NALBANDIAN,
an individual; and THE ESTATE OF
14 ANDREW J. NALBANDIAN, SR., deceased,

Case No. CV 10-01242 JF

**STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE AND
RELATED CASE MANAGEMENT
DEADLINES**

15 Plaintiffs,

16 vs.

17 LOCKHEED MARTIN CORPORATION, a
Maryland corporation, as administrator and
18 fiduciary of the Lockheed Martin Corporation
Salaried Employee Retirement Program;
19 LOCKHEED MARTIN CORPORATION
SALARIED EMPLOYEE RETIREMENT
20 PROGRAM, an Employee Pension Plan
within the meaning of 29 U.S.C. §§ 1002(2)(a)
21 and 1002(35); and DOES 1 through 50,
inclusive,

22 Defendants.
23

24 Plaintiffs ANDREW J. NALBANDIAN, JR. and GREGORY M. NALBANDIAN and
25 Defendants LOCKHEED MARTIN CORPORATION and LOCKHEED MARTIN
26 CORPORATION SALARIED EMPLOYEE RETIREMENT PROGRAM hereby stipulate, by and
27 through their respective counsel, to continue the dates by which the parties are required to (1) meet
28 and confer pursuant to Rule 26(f), which was scheduled to be completed by June 18, 2010; (2) file

1 a Rule 26(f) Report, which is currently due on or before July 2, 2010; (3) file Rule 26(a)(1) Initial
2 Disclosures, which is currently due on or before July 2, 2010; and (4) attend the case management
3 conference, which is currently scheduled for July 9, 2010. All of the current deadlines for these
4 case management dates were set by the Court’s March 25, 2010 ADR Scheduling Order (Docket
5 #4).

6 The parties agree that each of the above referenced deadlines should be continued until after
7 the Court rules on Defendants’ Motion To Dismiss Claims Two Through Five of the Complaint
8 and To Strike the Estate of Andrew J. Nalbandian, Sr. and Gregory M. Nalbandian as Plaintiffs
9 (“Motion to Dismiss”) (Docket #8), which is scheduled to be heard on August 27, 2010. The
10 parties respectfully make this request because the parties believe that the issues presented in the
11 case will be further clarified through the Court’s ruling on the Motion to Dismiss, which
12 clarification, in turn, will potentially affect the content and scope of the parties’ Rule 26(f)
13 conference, Rule 26(f) Report and Rule 26(a)(1) Initial Disclosures.

14 Therefore, in the interests of efficiency, cost effectiveness and judicial economy, the parties
15 agree that each of the above referenced actions shall be rescheduled to dates occurring after the
16 Court’s ruling on the Motion to Dismiss as follows: (1) the case management conference shall be
17 scheduled for Judge Fogel’s first available Friday that is at least twenty-eight (28) days after the
18 Court’s ruling on the Motion to Dismiss; (2) the parties shall meet and confer pursuant to Rule
19 26(f) within seven (7) days following the Court’s ruling on the Motion to Dismiss; (3) the parties
20 shall file their Rule 26(f) Report and serve Rule 26(a)(1) Initial Disclosures within fourteen (14)
21 days after the parties meet and confer. The case management conference scheduled for July 9,
22 2010 shall be taken off the calendar, provided the Court approves this stipulation.

23 The parties have made one previous modification to the case through the Stipulation re
24 Extension of Time to Respond to the Complaint (Docket #5), which extended the time to respond
25 to the complaint until May 27, 2010.

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The parties' current request for a continuance of case management deadlines will not alter any other dates or deadlines set by Court order.

DATED: June 22, 2010

HERRIG & VOGT, LLP

By: /s/Marcus L. Turner
Marcus L. Turner
Attorneys for Plaintiffs
ANDREW J. NALBANDIAN, JR. and
GREGORY M. NALBANDIAN

DATED: June 22, 2010

TRUCKER ♦ HUSS

By: /s/Clarissa A. Kang
Clarissa A. Kang
Attorneys for Defendants
LOCKHEED MARTIN CORPORATION and
LOCKHEED MARTIN CORPORATION
SALARIED EMPLOYEE RETIREMENT
PROGRAM

I attest that I have obtained Mr. Turner's concurrence in the filing of this document.

Dated: June 22, 2010

/s/Clarissa A. Kang
Clarissa A. Kang

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 23, 2010



Honorable Jeremy Fogel, Judge
United States District Court, District of Northern
California