

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PLUMBERS AND PIPEFITTERS LOCAL )  
UNION NO. 630 PENSION ANNUITY- )  
TRUST FUND, Individually and on Behalf of )  
All Others Similarly Situated, )

Plaintiff,

vs.

NORTHWEST PIPE COMPANY, et al., )  
Defendants. )

No. 3:09-cv-05724-RBL

(Consolidated)

STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING  
DEFENDANTS' ANSWER DATE

NOTE ON MOTION CALENDAR:  
September 15, 2011

STIPULATION

WHEREAS, on December 20, 1010, plaintiff Plumbers and Pipefitters Local No. 630 Pension Annuity-Trust Fund filed a Consolidated Complaint in this action; and

WHEREAS, on February 25, 2011, defendants filed motions to dismiss the Consolidated Complaint; and

WHEREAS, on August 26, 2011, the Court entered an Order denying defendants' motions to dismiss the Consolidated Complaint; and

WHEREAS, on September 10, 2011, the Court entered a Minute Order setting dates for the parties' FRCP 26(f) Conference, Initial Disclosures pursuant to FRCP 26(a)(1), and Combined Joint Status Report and Discovery Plan pursuant to FRCP 26(f) and Local Rule CR 16.

STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'  
ANSWER DATE - 1  
CASE NO. 3:09-cv-05724-RBL  
709280.0001/5173258.4

LANE POWELL PC  
1420 FIFTH AVENUE, SUITE 4100  
SEATTLE, WASHINGTON 98101-2338  
206.223.7000 FAX: 206.223.7107

1            THEREFORE, the parties, by and through their undersigned counsel, hereby stipulate  
2 and agree as follows:

3            1.        Defendants' answers to the Consolidated Complaint will be filed on or before  
4 October 24, 2011; and

5            2.        Plaintiff's objections to defendants' answers, if any, will be filed on or before  
6 November 23, 2011.

7 DATED: September 19, 2011

ROBBINS GELLER RUDMAN & DOWD LLP

8  
9            /s/ Christopher P. Seefer  
10 Christopher P. Seefer  
11 Christopher M. Wood  
12 Post Montgomery Center  
13 One Montgomery Street, Suite 1800  
14 San Francisco, CA 94104  
15 Telephone: (415) 288-4545  
16 Facsimile: (415) 288-4534  
17 E-mail: cseefer@rgrdlaw.com  
18 E-mail: cwood@rgrdlaw.com

19            Lead Counsel for Plaintiff

20            HAGENS BERMAN SOBOL SHAPIRO LLP  
21 Karl P. Barth, WSBA No. 22780  
22 1918 Eighth Avenue, Suite 3300  
23 Seattle, WA 98101  
24 Telephone: (206) 623-7292  
25 Facsimile: (206) 623-0594  
26 E-mail: karlb@hbsslaw.com

Liaison Counsel for Plaintiff

SUGARMAN & SUSSKIND  
Howard S. Susskind  
100 Miracle Mile, Suite 300  
Coral Gables, FL 33134  
Telephone: (305) 529-2801  
Facsimile: (305) 447-8115

Additional Counsel for Plaintiff

STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'  
ANSWER DATE - 2  
CASE NO. 3:09-cv-05724-RBL

709280.0001/5173258.4

LANE POWELL PC  
1420 FIFTH AVENUE, SUITE 4100  
SEATTLE, WASHINGTON 98101-2338  
206.223.7000 FAX: 206.223.7107

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

HOGAN LOVELLS US LLP

By: /s/ Robin E. Wechkin

Robin E. Wechkin, WSBA #24746  
8426 316<sup>th</sup> PI SE  
Issaquah, WA 98027  
Telephone: (425) 222-6229  
E-mail: [robin.wechkin@hoganlovells.com](mailto:robin.wechkin@hoganlovells.com)

HOGAN LOVELLS US LLP

George Mernick (Admitted *Pro Hac Vice*)  
555 13<sup>th</sup> Street NW  
Washington DC 20004  
Telephone: (202) 637-5726  
E-mail: [george.mernick@hoganlovells.com](mailto:george.mernick@hoganlovells.com)

Attorneys for Defendant Northwest Pipe  
Company

LANE POWELL PC

By: /s/ Larry S. Gangnes

Milo Petranovich (Admitted *pro hac vice*)  
Larry S. Gangnes, WSBA No. 08118  
Erin M. Wilson, WSBA No. 42454  
1420 Fifth Avenue, Suite 4100  
Seattle, WA 98101  
Telephone: (206) 227-7000  
Facsimile: (206)223-7107  
E-mail: [petranovichma@lanepowell.com](mailto:petranovichma@lanepowell.com)  
E-mail: [gangnesl@lanepowell.com](mailto:gangnesl@lanepowell.com)  
E-mail: [wilsonem@lanepowell.com](mailto:wilsonem@lanepowell.com)

Attorneys for Defendant Brian W. Dunham

1  
2 WILSON SONSINI GOODRICH & ROSATI

3 /s/ Barry M. Kaplan

4 Barry M. Kaplan  
5 Inessa Baram-Blackwell  
6 701 Fifth Avenue  
7 Suite 5100  
8 Seattle, WA 98104  
9 Telephone: (206) 883-2500  
10 Facsimile: (206) 883-2699  
11 E-mail: [bkaplan@wsgr.com](mailto:bkaplan@wsgr.com)  
12 E-mail: [ibaramblackwell@wsgr.com](mailto:ibaramblackwell@wsgr.com)

13 Douglas J. Clark  
14 Ignacio E. Salceda  
15 650 Page Mill Road  
16 Palo Alto, CA 94304  
17 Telephone: (650) 493-9300  
18 Facsimile: (650) 493-6811  
19 E-mail: [dclark@wsgr.com](mailto:dclark@wsgr.com)  
20 E-mail: [isalceda@wsgr.com](mailto:isalceda@wsgr.com)

21 Attorneys for Defendant Stephanie J. Welty

22 **ORDER**

23 Based on the above Stipulation of the parties, by and through their counsel of record,  
24 and for good cause showing, IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

25 1. Defendants' answers to the Consolidated Complaint will be filed on or before  
26 October 24, 2011; and

2. Plaintiff's objections to defendants' answers, if any, will be filed on or before  
November 23, 2011.

DATED: September 20, 2011.

27  
28   
29 THE HONORABLE RONALD B. LEIGHTON  
30 UNITED STATES DISTRICT COURT JUDGE

31 STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'  
32 ANSWER DATE - 4  
33 CASE NO. 3:09-cv-05724-RBL  
34 709280.0001/5173258.4

35 LANE POWELL PC  
36 1420 FIFTH AVENUE, SUITE 4100  
37 SEATTLE, WASHINGTON 98101-2338  
38 206.223.7000 FAX: 206.223.7107

1 Presented by:

2 LANE POWELL PC

3

/s/ Larry S. Gangnes

4 Milo Petranovich (Admitted *pro hac vice*)

5 Larry S. Gangnes, WSBA No. 08118

6

Attorneys for Defendant Brian W. Dunham

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'

ANSWER DATE - 5

CASE NO. 3:09-cv-05724-RBL

709280.0001/5173258.4

LANE POWELL PC  
1420 FIFTH AVENUE, SUITE 4100  
SEATTLE, WASHINGTON 98101-2338  
206.223.7000 FAX: 206.223.7107