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The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JOHN COLLIER, KRYSTA RENFRO, ALEX  
SAMUELS, BRADLEY CARICOFÉ, SHAWN  
THIBODEAUX, JULIE THIBODEAUX,  
CATHY CARROLL, LAZARO GOMEZ,  
KENNETH HUNNEL, LEANNE HUNNEL,  
and JAMES KOHEN individually, and on behalf  
of a class of similarly situated individuals,

Plaintiffs,

v.

FORD MOTOR COMPANY, a Delaware  
corporation,

Ford.

NO. 3:23-cv-05778-BHS

**STIPULATION AND ORDER  
REGARDING FIRST AMENDED  
COMPLAINT AND DEADLINE  
TO ANSWER COMPLAINT**

Noted on Motion Calendar:  
October 18, 2023

**STIPULATION**

Plaintiffs and Defendant Ford Motor Company, by and through their undersigned  
counsel, respectfully stipulate as follows:

1. Plaintiffs filed their initial Complaint in this case on August 28, 2023.
2. Defendant waived service of the Summons and Complaint pursuant to Federal Rule  
of Civil Procedure 4, which extended Defendant’s deadline to response to the  
Complaint to November 5, 2023.

STIPULATION AND ORDER REGARDING FIRST AMENDED  
COMPLAINT AND DEADLINE TO ANSWER COMPLAINT - 1  
NO. 3:23-cv-05778-BHS

- 1 3. Plaintiffs propose to file a First Amended Complaint on or before October 20, 2023.
- 2 4. Pursuant to Fed. R. Civ. P. 15(a)(2), Defendant hereby consents to Plaintiffs filing a
- 3 First Amended Complaint on or before October 20, 2023.
- 4 5. The Parties have stipulated to allow Defendant 49 days from the date of filing and
- 5 service of the First Amended Complaint to file a responsive pleading or motion
- 6 pursuant to Federal Rule of Civil Procedure 12.
- 7 6. Should Defendant respond to the First Amended Complaint with a motion pursuant
- 8 to Rule 12, the parties have agreed to a briefing schedule that will accommodate the
- 9 Parties' respective schedules.

10 NOW THEREFORE, the parties jointly stipulate and respectfully ask the Court to  
11 (1) grant leave to Plaintiffs to file a First Amended Complaint, (2) extend the deadline for  
12 Defendant to file a responsive pleading or motion pursuant to Federal Rule of Civil Procedure  
13 12 and set a briefing schedule as follows:

14 Plaintiffs' deadline to file first amended pleading:	October 20, 2023
15 Deadline to file responsive pleading or Rule 12 motion:	December 8, 2023
16 Plaintiffs' response to Rule 12 motion, if filed:	January 18, 2024
17 Defendant's reply in support of Rule 12 motion, if filed:	February 7, 2024
18 Noting date for Defendant's Rule 12 motion, if filed:	February 7, 2024

19 DATED this 17th day of October, 2023.

Respectfully submitted,

20 TOUSLEY BRAIN STEPHENS PLLC

21  
22 By: s/Jason T. Dennett  
Jason T. Dennett, WSBA #30686  
jdennett@tousley.com

23  
24 s/Cecily C. Jordan  
Cecily C. Jordan, WSBA #50061  
cjordan@tousley.com  
25 Kaleigh N. Boyd, WSBA #52684  
kboyd@tousley.com  
26 1200 5th Avenue, Suite 1700

STIPULATION AND ORDER REGARDING FIRST AMENDED  
COMPLAINT AND DEADLINE TO ANSWER COMPLAINT - 2  
NO. 3:23-cv-05778-BHS

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Seattle, WA 98101  
206.682.5600  
206.682.2992

Jonathan D. Selbin \*\*  
Jason L. Lichtman \*\*  
Muriel Kenfield-Kelleher \*\*  
LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP  
250 Hudson Street, 8th Floor  
New York, NY 10013-1413  
212.355.9500  
jselbin@lchb.com  
jlichtman@lchb.com  
mkenfieldkelleher@lchb.com

Andrew R. Kaufman \*\*  
LIEFF CABRASER HEIMANN  
& BERNSTEIN, LLP  
222 2nd Avenue South, Suite 1640  
Nashville, Tennessee 37201  
615.313.9000  
akaufman@lchb.com

Tarek H. Zohdy \*  
Cody R. Padgett \*  
Laura E. Goolsby \*  
Capstone Law, APC  
1875 Century Park East  
Suite 1000  
Los Angeles, CA 90067  
Telephone: (310) 556-4811  
Tarek.Zohdy@Capstonelawyers.com  
Cody.Padgett@Capstonelawyers.com  
Laura.Goolsby@Capstonelawyers.com

Russell D. Paul \*  
Abigail J. Gertner \*\*  
Amey J. Park \*\*  
BERGER MONTAGUE PC  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
215.875.3000  
rpaul@bm.net  
agertner@bm.net  
apark@bm.net

Ketan A. Patel \*  
CORPUS LAW PATEL, LLC  
P.O. Box 724713  
Atlanta, Georgia 31139

STIPULATION AND ORDER REGARDING FIRST AMENDED  
COMPLAINT AND DEADLINE TO ANSWER COMPLAINT - 3  
NO. 3:23-cv-05778-BHS

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678.597.8020  
kp@corpus-law.com

E. Powell Miller\*\*  
Dennis A. Lienhardt\*\*  
THE MILLER LAW FIRM PC  
950 W. University Dr., Ste. 300  
Rochester, MI 48307  
Telephone: (248) 841-2200  
Facsimile: (248) 652-2852  
epm@millerlawpc.com  
ssa@millerlawpc.com

Stephen R. Basser\*\*  
Samuel M. Ward\*\*  
BARRACK, RODOS, & BACINE  
600 W Broadway, Suite 900  
San Diego, CA 92101  
Telephone: (619)230-0800  
Facsimile: (619) 230-1874  
sbasser@barrack.com  
sward@barrack.com

John G. Emerson\*\*  
EMERSON FIRM, PLLC  
2500 Wilcrest, Suite 300  
Houston, TX 77042  
jemerson@emersonfirm.com  
Telephone: (800) 551-8649  
Facsimile: (501) 286-4659

\* *admitted pro hac vice*  
\*\* *pro hac vice forthcoming*

***Attorneys for Plaintiffs and the Proposed  
Classes***

SHOOK HARDY & BACON LLP

By: s/ Amit Nassihi  
Amir Nassihi, *admitted pro hac vice*  
555 MISSION ST STE 2300  
SAN FRANCISCO, CA 94105  
415-544-1900  
Fax: 415-391-0281  
Email: anassihi@shb.com

STIPULATION AND ORDER REGARDING FIRST AMENDED  
COMPLAINT AND DEADLINE TO ANSWER COMPLAINT - 4  
NO. 3:23-cv-05778-BHS

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SHOOK HARDY & BACON LLP  
Steven Rich, WSBA #48444  
701 5TH AVE STE 6800  
SEATTLE, WA 98104  
206-344-7620  
Email: srich@shb.com

*Attorneys for Defendant*

STIPULATION AND ORDER REGARDING FIRST AMENDED  
COMPLAINT AND DEADLINE TO ANSWER COMPLAINT - 5  
NO. 3:23-cv-05778-BHS


**ORDER**

Pursuant to the parties’ stipulation, Plaintiffs are granted leave to file a First Amended Complaint. The Court adopts the parties’ agreed briefing schedule, as set forth below:

- Plaintiffs’ deadline to file first amended pleading: October 20, 2023
- Deadline to file responsive pleading or Rule 12 motion: December 8, 2023
- Plaintiffs’ response to Rule 12 motion, if filed: January 12, 2024
- Defendant’s reply in support of Rule 12 motion, if filed: January 26, 2024
- Noting date for Defendant’s Rule 12 motion, if filed: January 26, 2024

IT IS SO ORDERED.

Dated this 19th day of October, 2023.




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The Honorable Benjamin H. Settle