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13 Attorneys For Defendant  
14 FORD MOTOR CO.

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA  
17 SACRAMENTO DIVISION

18  
19 MARGIE DANIEL, individually and )  
on behalf of a class of similarly situated )  
20 individuals, )

21 Plaintiff, )

22 v. )

23 FORD MOTOR COMPANY, a Delaware )  
corporation, )

24 Defendant. )

25 )

26 )

27 )

28 )

No. 2:11-cv-02890-WBS-EFB

**STIPULATED REQUEST TO MODIFY  
DATES *OTHER THAN* DATE OF TRIAL  
[L.R. 143]**

Courtroom: 5 (14<sup>th</sup> Floor)  
Judge: Hon. William B. Shubb

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1                   **STIPULATED REQUEST TO MODIFY DATES *OTHER THAN* DATE OF TRIAL**

2                   Pursuant to Local Rule 143, Plaintiff Margie Daniel and Defendant Ford Motor Company  
3 (collectively, the “Parties”) hereby jointly request that the Court extend the deadline for  
4 submission of the Parties’ Trial Briefs and voir dire requests, given that the Parties’ September  
5 12, 2017 trial date has now been vacated and a new trial date has not yet been set. The Parties  
6 request that the new deadline for submission of the parties’ Trial Briefs and voir dire requests be  
7 14 days before the new trial date. The Parties further request that the Court vacate the current  
8 deadlines for exchanging final trial exhibit lists, exchanging exhibits, filing objections to trial  
9 exhibits, and submitting evidentiary objections to deposition counter-designations. The Parties  
10 request that new deadlines for these submissions and exchanges be established once a new trial  
11 date is set.

12                   Accordingly, the Parties request that the deadline for the Parties’ Trial Briefs and voir  
13 dire requests be extended from September 1, 2017, to 14 days before the new trial date in this  
14 matter. The Parties further request that the Court vacate the existing deadlines for exchanging  
15 final trial exhibit lists, exchanging exhibits, filing objections to trial exhibits, and submitting  
16 evidentiary objections to deposition counter-designations, and that new deadlines for these  
17 submissions and exchanges be established once a new trial date has been set.

18 Dated: September 1, 2017

19                   Respectfully submitted,

20                   DYKEMA GOSSETT LLP  
21                   By: /s/John M. Thomas  
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Attorneys for Defendant  
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/s/John B. Thomas  
(as authorized on September 1, 2017)  
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Counsel for Plaintiff MARGIE DANIEL

SO ORDERED.

Dated: September 5, 2017



WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE