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 12 JANELLE HORNE

13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA
 15 SACRAMENTO DIVISION

16 JANELLE HORNE, individually and on behalf
 of all others similarly situated,

17 Plaintiffs,

18 v.

19 NISSAN NORTH AMERICA, INC., NISSAN
 20 MOTOR CO., LTD.

21 Defendants.

Case No. 2:17-cv-00436-MCE-DB

**STIPULATION AND ORDER TO EXTEND
 TIME TO RESPOND TO COMPLAINT**

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 24 This Stipulation is entered into by and between Plaintiff Janelle Horne and Defendant Nissan
 25 North America, Inc. (“NNA”) (collectively, the “Parties”), by and through their respective counsel,
 26 with reference to the following facts and recitals:

27 1. On January 4, 2017, Plaintiff filed the Complaint in this action in the Superior Court
 28 of the State of California in and for the County of Solano.

- 1 2. On February 27, 2017, NNA filed a Notice of Removal to this Court. (Dkt. 1)
- 2 3. Based on Plaintiff's mailing of the complaint, NNA's deadline to respond was
- 3 originally April 3, 2017.
- 4 4. Parties previously submitted a stipulation to extend NNA's time to respond by 21
- 5 days. As a result, NNA's response to the Complaint is currently due on April 24, 2017. (Dkt. 6)
- 6 5. Pursuant to Local Rule 144, NNA requested and Plaintiff consented to an additional
- 7 7-day extension of time for NNA to respond to the Complaint. The total extension, to respond to the
- 8 complaint, which includes the prior stipulated extension, is a total of 28 days.
- 9 6. Good cause exists for this request as Counsel for NNA has had a number of other
- 10 obligations, including appellate and trial court briefing, an appellate argument, and lengthy travel
- 11 obligations.

12 **IT IS HEREBY STIPULATED** by and between the parties, through their respective

13 counsel, that NNA shall have an additional 7 days to respond to Plaintiff's complaint, up to and

14 including **May 1, 2017** in which to answer, move, or respond to the Complaint.

15 Dated: April 14, 2017

SHOOK, HARDY & BACON L.L.P.

16 By: /s/ Amir Nassihi

17 Amir Nassihi

18 Attorneys for Defendant

19 NISSAN NORTH AMERICA, INC.

20 Dated: April 14, 2017

FINKELSTEIN & KRINSK LLP

21 By: /s/ Trenton Kashima (as authorized on 4/14/17)

22 Trenton Kashima

23 Attorneys for Plaintiff

24 JANELLE HORNE

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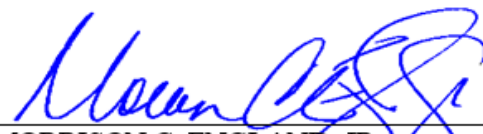
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ORDER

Pursuant to the parties' Stipulation, the deadline for NNA to respond to Plaintiff's Complaint is May 1, 2017.

IT IS SO ORDERED.

Dated: April 18, 2017



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE

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