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 11 JANELLE HORNE

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

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

16 Plaintiffs,

17 v.

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

20 Defendants.
 21

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

**STIPULATION AND ORDER TO
 CONTINUE DISCOVERY CUT-OFF AND
 OTHER PRETRIAL DEADLINES**

22
 23 This Stipulation is entered into by and between Plaintiff Janelle Horne and Defendant Nissan
 24 North America, Inc. (“NNA”) (collectively, the “Parties”),¹ by and through their respective counsel,
 25 with reference to the following facts and recitals:

26 _____
 27 ¹ Defendant Nissan Motor Co. Ltd. (“NML”) has not yet appeared and undersigned counsel solely
 28 represents NNA, not NML.

1 1. On August 16, 2017, NNA filed its Motion to Transfer, or in the alternative, to Stay
2 Proceedings. (Dkt. 19);

3 2. Plaintiff filed her Oppositions to these motions on September 7, 2017. (Dkt. 21 and
4 22);

5 3. On September 29, 2017, NNA filed its Reply Briefs in support of its Motions to
6 Dismiss and Transfer. (Dkt. 25 and 26);

7 4. On October 16, 2017, the court vacated the hearing date on NNA's Motion to Dismiss
8 and Motion to Transfer. (Dkt. 29)

9 5. The Initial Pretrial Scheduling Order (Dkt. 5) currently contemplates the following
10 deadlines:

Event	Current Deadline
Fact Discovery Cut-Off	February 27, 2018
Expert Witness Disclosures Due	April 30, 2018
Rebuttal Expert Disclosures Due	May 30, 2018
Dispositive Motions Due	August 27, 2018

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14 **IT IS HEREBY STIPULATED** by and between the parties, through their respective counsel, that
15 the deadlines set forth above shall be continued and shift to begin starting six months from the date
16 of the court's rulings on NNA's Motion to Dismiss and Motion to Transfer.

17
18 Dated: January 9, 2018

SHOOK, HARDY & BACON L.L.P.

19 By: /s/ Amir Nassihi
Amir Nassihi

20 Attorneys for Defendant
21 NISSAN NORTH AMERICA, INC.

22
23 Dated: January 9, 2018

FINKELSTEIN & KRINSK LLP

24 By: /s/ Lauren R. Presser (as authorized on 1/9/18)
Lauren R. Presser

25 Attorneys for Plaintiff
26 JANELLE HORNE

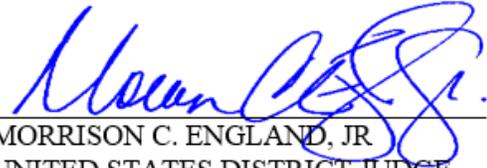
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ORDER

The parties' above-referenced stipulation is hereby GRANTED. The parties shall submit another proposed order reflecting the new discovery deadlines after the ruling on NNA's Motion to Dismiss and Motion to Transfer is issued.

IT IS SO ORDERED.

Dated: January 10, 2018


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE