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17 Attorneys for Defendant  
 18 FORD MOTOR COMPANY

19 (See signature blocks for complete listing of represented parties  
 20 and counsel)

21 **UNITED STATES DISTRICT COURT**  
 22 **EASTERN DISTRICT OF CALIFORNIA**

23 JACOB BERNARD RUSSELL SORENSON  
 24 and BERNARD SORENSON,  
 25  
 26 Plaintiffs,  
 27  
 28 v.  
 29 FORD MOTOR COMPANY et al.,  
 30  
 31 Defendants.

Case No. 2:17-cv-01987-JAM-AC  
**STIPULATION AND [PROPOSED]  
 ORDER INSTITUTING 60-DAY STAY**

1 Plaintiffs Jacob Bernard Russell Sorenson and Bernard Sorenson (“Plaintiffs”) and  
2 Defendant Ford Motor Company (“Ford”), through their undersigned counsel, represent to the  
3 Court:

4 WHEREAS, Ford removed this matter to federal court on September 25, 2017;

5 WHEREAS, the parties recently attended mediation that resulted in a provisional  
6 settlement, pending final acceptance by Plaintiffs;

7 WHEREAS, there are numerous impending deadlines in this matter, including the  
8 submission of a joint status report and Rule 26(f) discovery plan by November 27, 2017, the  
9 exchange of initial disclosures by the same date, and the filing of opposition and reply briefs in  
10 connection with motions set for hearing on December 5, 2017;

11 WHEREAS, given the provisional settlement, it would be inefficient for the parties to  
12 submit and for the Court to consider scheduling issues and any pending motions;

13 Plaintiffs and Ford hereby stipulate, subject to the approval of the Court, that this matter  
14 shall be stayed in its entirety for sixty (60) days and that the parties shall submit a joint status  
15 report to the Court on January 15, 2018 concerning the status of the settlement.

16  
17 Dated: November 17, 2017

*/s/ Rowena Santos (as authorized on Nov. 17, 2017)*  
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JACOB BERNARD RUSSELL SORENSON and  
BERNARD SORENSON

22  
23  
24  
25 Dated: November 17, 2017

*/s/ Matthew H. Dawson*  
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Attorneys for Defendant  
FORD MOTOR COMPANY

**IT IS SO ORDERED.**

DATED: November 17, 2017

/s/ JOHN A. MENDEZ  
The Honorable John A. Mendez  
United States District Judge