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FORD MOTOR COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KENNETH HUNNEL, LEANNE HUNNEL,
Individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No.: 2:24-cv-00423-DJC-DB

**JOINT STIPULATION AND ORDER
REGARDING BRIEFING SCHEDULE
ON DEFENDANT'S MOTION TO
DISMISS**

1 Plaintiffs KENNETH HUNNEL AND LEANNE HUNNEL (“Plaintiffs”) and Defendant
2 FORD MOTOR COMPANY (“Defendant” or “Ford”), collectively referred to as the “Parties,” by
3 and through their respective counsel, have met and conferred regarding the briefing schedule
4 (“Schedule”) as extended on Defendant’s motion to dismiss Plaintiff’s First Amended Class Action
5 Complaint (“FAC”), and subject to Court approval and having agreed to further extend the Schedule,
6 hereby stipulate as follows:

- 7 1. On February 7, 2024, Plaintiff filed the original complaint (Dkt. 1); and
- 8 2. On April 18, 2024, the Court granted Defendant’s L.R. 28-day extension to respond to June
9 3, 2024 (Dkt. 15); and
- 10 3. On May 24, 2024, and pursuant to the Parties’ Joint Status Report (Dkt. 16), the Court granted
11 the Parties’ stipulation for Plaintiff to file an amended complaint on July 3, 2024 and for
12 Defendant to respond on August 23, 2024 (Dkt. 19); and
- 13 4. On July 3, 2024, the FAC was filed (Dkt. 28) which added new plaintiffs; and
- 14 5. On September 13, 2024, Defendant filed a Motion to Dismiss (Dkt. 32); and
- 15 6. On October 29, 2024, the Court permitted Defendant to withdraw its Motion to Dismiss
16 without prejudice as to re-filing by November 25, 2024 while the Parties continued to meet
17 and confer regarding their efforts to reach a resolution (Dkt. 36); and
- 18 7. On November 25, 2024, Defendant filed the currently pending Motion to Dismiss and noticed
19 it for hearing on March 20, 2025 (Dkt. 37); and
- 20 8. Plaintiffs’ response to the pending Motion to Dismiss was extended by stipulation and court
21 order to January 17, 2025 (Dkt. 40), and Defendant’s reply was extended by stipulation and
22 court order to February 19, 2025 (Dkt. 40); and
- 23 9. On December 13, 2024, Plaintiff Stephen Jackson filed his Notice of Voluntary Dismissal
24 Without Prejudice (Dkt. 41); and
- 25 10. In light of the recent changes to the case and such other discussions between the Parties, the
26 Parties have conferred and have agreed to further extend the deadlines to the pending Motion
27 to Dismiss as follows: Plaintiffs shall be permitted to file their response to the pending Motion
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to Dismiss on or before February 14, 2025, and Defendant shall be permitted to file its reply on or before March 14, 2025.

IT IS SO STIPULATED AND AGREED.

Dated: January 16, 2025

CAPSTONE LAW APC

/s/ Nathan N. Kiyam
Cody R. Padgett
Nathan N. Kiyam

Attorneys for Plaintiffs

Dated: January 16, 2025

SHOOK, HARDY & BACON L.L.P.

/s/ Amir Nassihi (as authorized on 1/15/2025)
AMIR NASSIHI

Attorneys for Defendant
FORD MOTOR COMPANY

ATTESTATION OF SIGNATURE

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Pursuant to Civil L.R. 131(e), the undersigned hereby attests that concurrence in the filing of this document has been obtained from all signatories hereto.

Dated: January 16, 2025

/s/ Nathan N. Kiyam _____

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ORDER

The parties' above-referenced stipulation is hereby GRANTED. Plaintiffs shall file their response to the pending Motion to Dismiss on or before February 14, 2025, and Defendant shall file its reply on or before March 14, 2025. Further, the Court VACATES the hearing on Defendant's Motion to Dismiss, set for March 20, 2025, and RESETS the matter for hearing on April 3, 2025, at 1:30 PM in Courtroom 7 before District Judge Daniel J. Calabretta.

IT IS SO ORDERED.

Dated: January 17, 2025

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE