

Snell & Wilmer
L.L.P.
LAW OFFICES
600 Anton Boulevard, Suite 1400
Costa Mesa, California 92626-7689
(714) 427-7000

1 Jeffrey L. Fazio (#146043) - jlf@fazmiclaw.com
2 Dina E. Micheletti (#184141) - dem@fazmiclaw.com
3 FAZIO MICHELETTI LLP
4 2410 Camino Ramon, Suite 315
5 San Ramon, California 94583
6 925.543.2555

7 Michael von Loewenfeldt (#178665) - mvl@kerrwagstaffe.com
8 Michael Ng (#237915) - mn@kerrwagstaffe.com
9 KERR & WAGSTAFFE LLP
10 100 Spear Street, Suite 1800
11 San Francisco, California 94105-1528
12 415.371.8500

Attorneys for PLAINTIFFS

13 Warren E. Platt (#154086) - wplatt@swlaw.com
14 Robert J. Gibson (#144974) - hgibson@swlaw.com
15 SNELL & WILMER L.L.P.
16 600 Anton Boulevard, Suite 1400
17 Costa Mesa, California 92626-7689
18 714.427.7000

Attorneys for Defendant FORD MOTOR COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA -- SAN FRANCISCO

19 RICHARD SMITH and REBECCA
20 KLEIN, on behalf of themselves and all
21 others similarly situated,

Plaintiffs,

vs.

22 FORD MOTOR COMPANY and
23 DOES 1-100, inclusive,

Defendants.

CASE NO.: C-06-00497-MMC

Honorable Maxine M. Chesney
Courtroom 7

**STIPULATION TO REVISE
SCHEDULE REGARDING
DISPOSITIVE MOTION; ~~PROPOSED~~
ORDER**

DATE OF FILING: 01/25/06
TRIAL DATE: None

24 IT IS HEREBY STIPULATED by and between Plaintiffs Richard Smith and
25 Rebecca Klein and Defendant Ford Motor Company ("Ford"), as follows:

26 WHEREAS, on August 19, 2008, the Court adopted the August 18 Stipulation
27 Establishing Schedule Regarding Dispositive Motion, as amended; and

28 WHEREAS, Ford has determined that the discovery associated with the motions to
be filed, and preparation of the motions themselves, requires that the date for filing of the

1 motions be extended two weeks, and has agreed to extend the date for plaintiffs filing of
2 their responsive pleadings by two weeks;

3 NOW, THEREFORE, the parties hereby stipulate and request a revised schedule,
4 as follows:

5 November 17, 2008	Defendant files motion for summary judgment
6 February 9, 2009	Plaintiffs conclude discovery pertaining to issues raised by 7 motion for summary judgment (including depositions of 8 Defendant's declarants)
9 February 23, 2009	Plaintiffs file opposition to motion for summary judgment and 10 (possibly) cross-motion for summary judgment
11 March 9, 2009	Defendant completes depositions of Plaintiffs' declarants
12 March 23, 2009	Defendant files reply brief in support of motion for summary 13 judgment
14 April 3, 2009	Hearing of motion for summary judgment

15
16 IT IS SO STIPULATED.

17 Dated: October 29, 2008

FAZIO MICHELETTI LLP

18
19 By://s//Jeffrey L. Fazio

20 Jeffrey L. Fazio
21 Dina E. Micheletti
Attorneys for PLAINTIFFS

22 Dated: October 29, 2008

KERR & WAGSTAFFE LLP

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24 By://s//Michael von Loewenfeldt

25 Michael von Loewenfeldt
26 Michael Ng
Attorneys for PLAINTIFFS

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Dated: October 29, 2008

SNELL & WILMER L.L.P.

By: //s//Warren E. Platt
Warren E. Platt
Robert J. Gibson
Attorneys for Defendant
FORD MOTOR COMPANY

IT IS SO ORDERED, with the exception that the hearing on defendant's motion for summary judgment shall be on April 10, 2009 and, in the event plaintiffs file a cross-motion for summary judgment, the parties shall, no later than five days thereafter, submit a stipulated revised briefing schedule, in which the proposed hearing date on both motions is no earlier than three weeks after plaintiffs' reply is filed.

Dated: October 30, 2008


Honorable Maxine M. Chesney
United States District Judge