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 Robert Smith and Rebecca Klein,
 6 on behalf of themselves and
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11 Attorneys for Defendant
 12 Ford Motor Company

13 ***Additional Counsel Listed***
on Signature Page

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16

17 ROBERT SMITH AND REBECCA
 18 SMITH, on behalf of themselves and all
 19 others similarly situated,

20 Plaintiffs,

21 v.

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

24 Defendants.

Case No. C 06 0497 MMC JL

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING FILING
 AND HEARING DATES
 REGARDING FORD'S MOTIONS
 FOR SUMMARY JUDGMENT**

1 Due to unanticipated events that were outside the control of Plaintiffs'
2 counsel, Plaintiffs require a brief extension of time to prepare and file their
3 opposition to Defendant Ford Motor Company's motions for summary judgment.
4 Ford has agreed to an extension of up to six calendar days for the filing of Plaintiffs'
5 opposition if Ford obtains a reciprocal extension of six calendar days for the filing of
6 Ford's reply papers. Plaintiffs have agreed to Ford's proposal. Accordingly, the
7 parties hereby submit the following stipulation for the Court's approval:

8
9 July 6, 2009 Plaintiffs file briefs in opposition to motions for summary
judgment and (possibly) cross-motion for summary judgment.
10 July 27, 2009 Defendant completes depositions of Plaintiffs' declarants.
11 August 10, 2009 Defendant files reply brief(s) in support of motions for
summary judgment.
12 September 4, 2009 Hearing of motions for summary judgment.¹
13

14 **SO STIPULATED.**

15 DATED: June 29, 2009

FAZIO | MICHELETTI LLP

17 by /s/ Jeffrey L. Fazio
Jeffrey L. Fazio

18
19 Michael von Loewenfeldt
Michael Ng
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23 Attorneys for Plaintiffs
24 Robert Smith and Rebecca Klein, on behalf of
themselves and all others similarly situated
25

26 ¹ In the event that Plaintiffs file a cross-motion for summary judgment, the
27 parties' shall, no later than five days thereafter, submit a stipulated revised briefing
28 schedule in which the proposed hearing date on both motions shall be no earlier
than three weeks after plaintiffs' reply is filed.

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DATED: June 29, 2009

SNELL & WILMER LLP

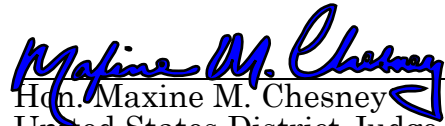
by /s/ Robert J. Gibson

Robert J. Gibson

Attorneys for Defendant
Ford Motor Company

SO ORDERED.

DATED: June 30, 2009


Hon. Maxine M. Chesney
United States District Judge