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26 ¹ Ms. Gettman's counsel are also counsel of record for plaintiffs Vincent Perrone, Charles Johnson,
27 Zane Dery, Richard Douglas, Melia Douglas, Thomas Bell, and Michael Antramgarza in *Perrone v.*
Ford Motor Company, No. C11-03832 HRL (N.D. Cal.) (filed August 3, 2011).

28 STIPULATED EXTENSION OF TIME TO PLEAD
OR OTHERWISE RESPOND AND TO VACATE CASE MANAGEMENT ORDER

CV 11 3133 NJV
CV 11 2953 SC

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DENNIS DOUGHERTY, HEATHER S. HARDEE, SPENCER WARE, GARY L. BUCK and
THOMAS M. BUCKHEIT, individually, and on behalf of all others similarly situated**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SALLY J. NETTLETON, THERESA THRUN,
CAROL WILSON, DENNIS DOUGHERTY,
HEATHER S. HARDEE, SPENCER WARE,
GARY L. BUCK and THOMAS M.
BUCKHEIT, individually, and on behalf of all
others similarly situated,

Plaintiffs,

vs.

FORD MOTOR COMPANY, and DOES 1
through 100, inclusive,

Defendants.

Case No. C11-02953 SC

Related Case No. CV 11-03133 SC

**STIPULATED EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS'
COMPLAINT AND VACATE CASE
MANAGEMENT/SCHEDULING ORDER**

[PROPOSED] ORDER
(lodged under separate cover)

JO ANN GETTMAN, on behalf of herself and
all other similarly situated,

Plaintiffs,

vs.

FORD MOTOR COMPANY, and DOES 1
through 100, inclusive,

Defendants.

Case No. C11-03133 SC

Related Case No. CV 11-02953 SC

1 WHEREAS on July 29, 2011, this Court Ordered a briefing schedule based on the *Gettman*
2 and *Nettleton* Plaintiffs' Stipulation regarding the filing of competing Motions for Interim Class
3 Counsel appointment, this Court ordered that the Motions are due on or before August 3, 2011, with
4 responsive briefing filed on or before August 10, 2011 and reply briefing filed on or before August
5 15, 2011.

6 WHEREAS pursuant to one prior stipulated extension of time, Defendant Ford Motor
7 Company's response to the Complaints in both the *Gettman* and *Nettleton* actions are currently due
8 on August 18, 2011. However, Counsel for the *Gettman* and *Nettleton* Plaintiffs both anticipate that
9 a Consolidated Complaint for these related matters will be filed once the Court selects Interim Class
10 Counsel and sets a deadline by which that pleading is to be filed. For that reason, and subject to this
11 Court's approval, the Parties have stipulated to extend the time for Ford Motor Company to respond
12 to the related *Gettman* and *Nettleton* actions to within 21 days after a Consolidated Complaint is
13 filed.²

14 For these reasons, Parties also respectfully request that the current Scheduling Orders for the
15 *Gettman* and *Nettleton* actions be vacated and re-issued once Interim Class Counsel is appointed and
16 any Consolidated Complaint is filed.

17 THEREFORE, IT IS HEREBY STIPULATED by and between the parties of the above
18 referenced related matters, pursuant to L.R. 6-1(a), that defendant FORD MOTOR COMPANY's
19 time to answer or otherwise respond to the Complaint will be extended to 21 days after a
20 Consolidated Complaint is filed, or 21 days after FORD MOTOR COMPANY receives notice that
21 no such Complaint will be filed.

22 ~~In addition, Parties STIPULATE and REQUEST that the current Case Management Schedule~~
23 ~~be vacated and reset pending outcome of Plaintiffs' Motion for Appointment of Interim Lead~~
24 ~~Counsel and filing of any Consolidated Complaint.~~

25 _____
26 ² In the event that no Consolidated Complaint is filed, then Ford Motor Company would respond to
27 the existing *Gettman* and *Nettleton* Complaints within 21 days of receiving written notice of that
28 fact.

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DATED: August 9, 2011

SHOOK, HARDY & BACON, L.L.P.

By: /s/ Amir Nassihi
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Attorneys for Defendant
FORD MOTOR COMPANY

DATED: August 9, 2011

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DATED: August 9, 2011

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