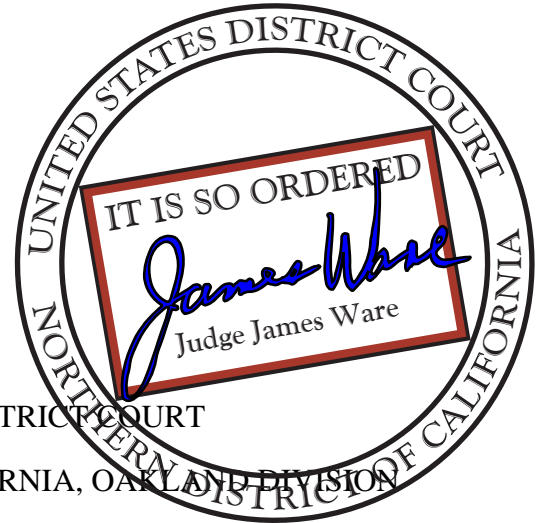


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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

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 12 GEORGE NICOUD, on Behalf of Himself
 and All Others Similarly Situated,
 13
 14 Plaintiffs,

15 v.

16 FURUKAWA ELECTRIC COMPANY,
 LTD.; DENSO CORPORATION; DENSO
 17 INTERNATIONAL AMERICA, INC.;
 DELPHI AUTOMOTIVE LLP; LEAR
 18 CORPORATION; YAZAKI
 CORPORATION; YAZAKI NORTH
 19 AMERICA, INC.; TOKAI RIKA
 COMPANY, LTD; LEONI AG;
 20 SUMITOMO ELECTRIC INDUSTRIES,
 LTD.; and S-Y SYSTEMS
 21 TECHNOLOGIES EUROPE GMBH,
 22

23 Defendants.

Case No. 11-cv-05057 ~~LB~~ JW

Judge: Hon. Laurel Beeler
 Dept.: Courtroom 4, 3rd Floor

**STIPULATION FOR EXTENSION OF
 TIME TO RESPOND TO CLASS
 ACTION COMPLAINT**

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1 Currently pending before the United States Judicial Panel on Multidistrict Litigation
2 (“JPML”) is a motion filed on October 11, 2011, pursuant to 28 U.S.C. § 1407, to consolidate for
3 pretrial proceedings a number of related civil actions alleging that defendants engaged in a price-
4 fixing conspiracy regarding automotive electrical wire harness systems (the “Related Actions”).

5 So as to preserve both party and judicial resources pending the JPML’s decision in this
6 matter, plaintiff George Nicoud (“Plaintiff”) and defendants Lear Corporation, Yazaki North
7 America, Inc., and DENSO International America, Inc. (collectively, “Stipulating Defendants”),
8 by and through their undersigned counsel, stipulate to the following:

9 (1) If the JPML transfers all related civil actions to a single district for coordinated or
10 consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407, the Stipulating Defendants shall,
11 as permitted by Federal Rule 12, answer, move or otherwise respond to the complaint in the
12 above-captioned action (the “Complaint”) within 45 days after: (a) the plaintiffs in the
13 consolidated actions serve a consolidated amended complaint, or (b) the plaintiffs in the
14 consolidated actions serve notice that they will not file a consolidated amended complaint.

15 (2) If the JPML denies the motion to transfer all related civil actions to a single district
16 for coordinated or consolidated pretrial proceedings, the Stipulating Defendants shall, as
17 permitted by Federal Rule 12, answer, move or otherwise respond to the Complaint within 45
18 days after service of the JPML ruling.

19 (3) If all plaintiffs in the Related Actions agree to consolidate all related civil actions
20 in a single district and withdraw the pending motions before the JPML, and the Stipulating
21 Defendants, or any of them, have not and do not file their own motions to transfer the Related
22 Actions to a single district for coordinated or consolidated pretrial proceedings pursuant to 28
23 U.S.C. § 1407, the Stipulating Defendants shall, as permitted by Rule 12, answer, move or
24 otherwise respond to the Complaint within 45 days after: (a) the plaintiffs in the consolidated
25 actions file a consolidated amended complaint, or (b) the plaintiffs in the consolidated actions file
26 notice that they will not file a consolidated amended complaint.

27 (4) Notwithstanding paragraphs (1), (2) or (3), above, if any Stipulating Defendant
28 files an answer, moves or otherwise responds pursuant to Federal Rule 12 in any of the Related

1 Actions before the date required by this stipulation, such Stipulating Defendant will concurrently
2 file its answer, move or otherwise respond as permitted by Rule 12 in this matter.

3 (5) Plaintiff and the Stipulating Defendants stipulate and agree that the entry into this
4 stipulation by the Stipulating Defendants shall not constitute a waiver of (a) any jurisdictional
5 defenses that may be available under Rule 12 of the Federal Rules of Civil Procedure, (b) any
6 affirmative defenses under Rule 8 of the Federal Rules of Civil Procedure or (c) any other
7 statutory or common law defenses that may be available to the Stipulating Defendants in this and
8 the other Related Actions. The Stipulating Defendants expressly reserve their rights to raise any
9 such defenses (or any other defense) in response to either the current Complaint or any amended
10 complaint that may be filed relating to this action.

11 (6) Plaintiff further agrees that this extension is available, without further stipulation
12 with counsel for Plaintiff, to all named defendants who notify Plaintiff in writing of their
13 intention to join this Stipulation.

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1 **IT IS SO STIPULATED.**

2 Dated: November 7, 2011

GLANCY BINKOW & GOLDBERG LLP

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By: /s/ Joseph Barton
Joseph Barton

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1 Dated: November 7, 2011

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Dated: November 7, 2011

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