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LATHAM & WATKINS LLP
Daniel M. Wall (State Bar No. 102580)
505 Montgomery Street, Ste. 2000
San Francisco, CA 94111-6538
Telephone: (415) 391-0600
Facsimile: (415) 395-8095
dan.wall@lw.com

Attorney for Defendant
Sumitomo Electric Industries, Ltd.
(Additional Attorneys Listed On Signature Page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

ESTABAN MARAVILLA, TONY
MARAVILLA & GRETHA
WILKERSON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

DELPHI AUTOMOTIVE LLP,
FURUKAWA ELECTRIC
COMPANY LTD.; LEAR CORP.;
LEONI AG; SUMITOMO ELECTRIC
INDUSTRIES, LTD.; S-Y SYSTEMS
TECHNOLOGIES GMBH; YAZAKI
CORP.; YAZAKI NORTH AMERICA
INC.,

Defendants.

CASE NO. 3:12-cv-00258-JCS

Hon. Joseph C. Spero

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

1 Pursuant to Civil Local Rule 6-1, plaintiffs Estaban Maravilla, Tony
2 Maravilla and Gretha Wilkerson (“Plaintiffs”) and defendant Sumitomo Electric
3 Industries, Ltd. (“Sumitomo”) hereby jointly file the instant Stipulation for
4 Extension of Time to Respond to Class Action Complaint.

5 Currently pending before the United States Judicial Panel on Multidistrict
6 Litigation (“JPML”) is a motion that was filed on October 11, 2011, pursuant to 28
7 U.S.C. § 1407, to consolidate for pretrial proceedings a number of related civil
8 actions that allege that defendants engaged in a price-fixing conspiracy regarding
9 automotive electrical wire harness systems (the “Related Actions”). So as to
10 preserve both party and judicial resources pending the JPML’s decision in this
11 matter, Plaintiffs and Sumitomo, by and through their undersigned counsel,
12 stipulate to the following:

13 (1) If the JPML transfers all related civil actions to a single district for
14 coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407,
15 Sumitomo shall, as permitted by Federal Rule 12, answer, move or otherwise
16 respond to the complaint in the above-captioned action (the “Complaint”) within
17 45 days after: (a) the plaintiffs in the consolidated actions serve a consolidated
18 amended complaint, or (b) the plaintiffs in the consolidated actions serve notice
19 that they will not file a consolidated amended complaint.

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

24 (3) If all plaintiffs in the Related Actions agree to consolidate all related civil
25 actions in a single district and withdraw the pending motions before the JPML, and
26 Sumitomo has not filed and does not file its own motion to transfer the Related
27 Actions to a single district for coordinated or consolidated pretrial proceedings
28 pursuant to 28 U.S.C. § 1407, Sumitomo shall, as permitted by Rule 12, answer,

1 move or otherwise respond to the Complaint within 45 days after: (a) the plaintiffs
2 in the consolidated actions file a consolidated amended complaint, or (b) the
3 plaintiffs in the consolidated actions file notice that they will not file a consolidated
4 amended complaint.

5 (4) Notwithstanding paragraphs (1), (2) or (3), above, if Sumitomo files an
6 answer, moves or otherwise responds pursuant to Federal Rule 12 in any of the
7 Related Actions before the date required by this stipulation, Sumitomo will
8 concurrently file its answer, move or otherwise respond as permitted by Rule 12 in
9 this matter.

10 (5) Plaintiffs and Sumitomo stipulate and agree that the entry into this
11 stipulation by Sumitomo shall not constitute a waiver of (a) any jurisdictional
12 defenses that may be available under Rule 12 of the Federal Rules of Civil
13 Procedure, (b) any affirmative defenses under Rule 8 of the Federal Rules of Civil
14 Procedure or (c) any other statutory or common law defenses that may be available
15 to Sumitomo in this and the other Related Actions. Sumitomo expressly reserves
16 its rights to raise any such defenses (or any other defense) in response to either the
17 current Complaint or any amended complaint that may be filed relating to this
18 action.

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1 IT IS SO STIPULATED.

2 Dated: February 1, 2012

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THE TERRELL LAW GROUP

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By: */s/ Reginald Terrell*

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Reginald Terrell

8

Post Office Box 13315, PMB #148

Oakland, CA 94661

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Telephone: (510) 237-9700

10

Facsimile: (510) 237-4616

reggie2@aol.com

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Attorney for Plaintiffs

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1 Dated: February 1, 2012

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LATHAM & WATKINS LLP

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By: /s/ Daniel M. Wall

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Daniel M. Wall

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LATHAM & WATKINS LLP

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Daniel M. Wall (State Bar No. 102580)

8

505 Montgomery Street, Ste. 2000

9

San Francisco, CA 94111-6538

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Telephone: (415) 391-0600

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Facsimile: (415) 395-8095

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dan.wall@lw.com

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Attorney for Defendant

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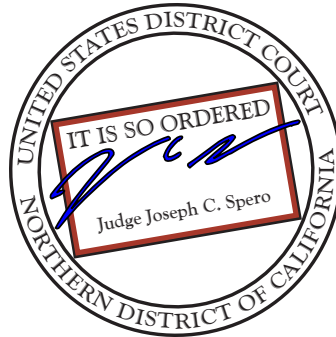
Sumitomo Electric Industries, Ltd.

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Dated: February 2, 2012

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