

1 Beth E. Terrell, CSB #178181
 Email: bterrell@tmdwlaw.com
 2 TERRELL MARSHALL DAUDT & WILLIE PLLC
 936 North 34th Street, Suite 400
 3 Seattle, Washington 98103-8869
 Telephone: (206) 816-6603
 4 Facsimile: (206) 350-3528

5 Steven N. Berk
 Email: steven@berklawdc.com
 6 Matthew J. Bonness, CSB #229226
 Email: matt@berklawdc.com
 7 BERK LAW PLLC
 8 2002 Massachusetts Avenue, Northwest, Suite 100
 Washington, District of Columbia 20036
 9 Telephone: (202) 232-7550
 10 Facsimile: (202) 232-7556

11 [Additional Counsel Appear on Signature Page]

12 *Attorneys for Individual and Representative*
 13 *Plaintiffs Alex Soto and Vince Eagen*

14 UNITED STATES DISTRICT COURT
 15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 ALEX SOTO and VINCE EAGEN, on behalf
 of themselves and all others similarly situated,

17 Plaintiffs,

18 v.

19 AMERICAN HONDA MOTOR CO., INC.,

20 Defendant.

Case No. 3:12-cv-01377-SI

**JOINT STIPULATION
 EXTENDING BRIEFING
 SCHEDULE REGARDING
 DEFENDANT’S MOTION TO
 COMPEL ARBITRATION AND
 TO STAY PROCEEDINGS**

CLASS ACTION

Complaint Filed: March 19, 2012

24 This stipulation is entered into by Plaintiffs Alex Soto and Vince Eagen (“Plaintiffs”)
 25 and Defendant American Honda Motor Co., Inc. (“AHM” or “Defendant”) (collectively, the
 26

1 “Parties”), by and through their respective counsel, with reference to the following facts and
2 recitals:

3 A. Plaintiffs filed their Class Action Complaint in the subject action on March 19,
4 2012 (Dkt. #1);

5 B. The parties subsequently stipulated to Plaintiffs filing an amended complaint
6 and to a proposed filing and briefing schedule regarding Plaintiffs’ First Amended Complaint
7 and Defendant’s response to the First Amended Complaint, which the Court approved by order
8 dated May 22, 2012 (Dkt. #12);

9 C. Pursuant to the stipulated filing and briefing schedule, Plaintiffs filed their First
10 Amended Complaint on May 18, 2012 (Dkt. #11) and on June 8, 2012, Defendant filed an
11 Answer to Plaintiffs’ First Amended Complaint (Dkt. #15) as well as a Motion to Compel
12 Arbitration and Stay Proceedings as to Plaintiff Vince Eagen (Dkt. #16) (“Arbitration
13 Motion”);

14 D. When agreeing to the earlier stipulated filing and briefing schedule on
15 Defendant’s response to the First Amended Complaint, Plaintiffs were unaware that Defendant
16 would file the Arbitration Motion;

17 E. Plaintiffs have reviewed the Arbitration Motion and determined that limited
18 arbitration-related discovery is necessary to properly and completely respond to the Arbitration
19 Motion;

20 F. Accordingly, counsel for the Parties have met and conferred with respect to
21 extending the briefing schedule and hearing date on the Arbitration Motion to permit Plaintiffs
22 to take limited arbitration-related discovery, and subject to the Court’s approval, agree to the
23 following:

EVENT	DATE
Plaintiffs to serve arbitration-related discovery including subpoena for deposition to Third Party American Honda Finance Corp.:	June 22, 2012
Defendant to respond to arbitration-related discovery:	August 6, 2012
Deadline for Plaintiffs to take any depositions in connection with arbitration-related discovery:	August 16, 2012
Deadline for the Parties to file joint statement regarding disputes, if any, regarding arbitration-related discovery:	August 20, 2012
Plaintiffs to file Opposition to Arbitration Motion, subject to scheduling of deposition of Third Party American Honda Finance Corp.:	September 4, 2012
Defendant to file Reply in Support of Arbitration Motion:	September 18, 2012
Proposed hearing date:	October 5 , 2012 at 9:00 a.m.

G. The Parties agree that any arbitration-related discovery offered by AHM does not constitute a waiver of AHM's right to compel arbitration or to assert that discovery is a gateway issue for the arbitrator to decide.

H. No trial date has been set.

STIPULATED AND DATED this 21st day of June, 2012.



1 TERRELL MARSHALL DAUDT
2 & WILLIE PLLC

LOEB & LOEB LLP

3 By: /s/Beth E. Terrell, CSB #178181
4 Beth E. Terrell, CSB #178181
5 Email: bterrell@tmdwlaw.com
6 936 North 34th Street, Suite 400
7 Seattle, Washington 98103-8869
8 Telephone: (206) 816-6603
9 Facsimile: (206) 350-3528

By: /s/ Denise A. Smith-Mars, CSB #215057
Michael L. Mallow, CSB #188745
Email: mmallow@loeb.com
Denise A. Smith-Mars, CSB# 215057
Email: dmars@loeb.com
10100 Santa Monica Blvd., Suite 2200
Los Angeles, California 90067
Telephone: (310) 282-2000
Facsimile: (310) 282-2200

8 Steven N. Berk
9 Email: steven@berklawdc.com
10 Matthew J. Bonness, CSB #229226
11 Email: matt@berklawdc.com
12 BERK LAW PLLC
13 2002 Massachusetts Avenue,
14 Northwest, Suite 100
15 Washington, DC 20036
16 Telephone: (202) 232-7550
17 Facsimile: (202) 232-7556

Attorneys for Defendant

14 Michael F. Ram, CSB #104805
15 Email: mram@rocklawcal.com
16 RAM, OLSON, CEREHINO
17 & KOPCZYNSKI
18 555 Montgomery Street, Suite 820
19 San Francisco, California 94111
20 Telephone: (415) 433-4949
21 Facsimile: (415) 433-7311

*Attorneys for Individual and Representative
22 Plaintiffs Alex Soto and Vince Eagen*

CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on June 21, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Michael L. Mallow, CSB #188745
Email: mmallow@loeb.com
Darlene M. Cho, CSB #251167
Email: dcho@loeb.com
Denise A. Smith-Mars, CSB# 215057
Email: dmars@loeb.com
LOEB & LOEB LLP
10100 Santa Monica Blvd., Suite 2200
Los Angeles, California 90067
Telephone: (310) 282-2000
Facsimile: (310) 282-2200

Attorneys for Defendant

DATED this 21st day of June, 2012.

TERRELL MARSHALL DAUDT & WILLIE PLLC

By: /s/ Beth E. Terrell, CSB #178181
Beth E. Terrell, CSB #178181
Email: bterrell@tmdwlaw.com
936 North 34th Street, Suite 400
Seattle, Washington 98103-8869
Telephone: (206) 816-6603
Facsimile: (206) 350-3528

*Attorneys for Individual and Representative
Plaintiffs Alex Soto and Vince Eagen*