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 22 AUTOMOTIVE GROUP, INC., DOLLAR RENT A  
 23 CAR, INC. and DTG OPERATIONS, INC.

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

26 SANDRA McKINNON and KRISTEN  
 27 TOOL, individually and on behalf of all others  
 28 similarly situated,

Plaintiffs,

v.

DOLLAR THRIFTY AUTOMOTIVE  
 GROUP, INC. d/b/a DOLLAR RENT A CAR;  
 DOLLAR RENT A CAR, INC.; DTG  
 OPERATIONS, INC. d/b/a DOLLAR RENT  
 A CAR; and DOES 1-10, inclusive,

Defendants.

Case No. 12-cv-04457- SC

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO: (1) ENLARGE TIME TO  
 RESPOND TO AMENDED MOTION FOR  
 CLASS CERTIFICATION AND MOTION  
 TO GRANT REQUEST FOR  
 INTERVENTION AND TO FILE  
 FOURTH AMENDED COMPLAINT; AND  
 (2) CONTINUE HEARING DATE**

Current Hearing Date: October 30, 2015  
 Time: 10:00 a.m.  
 Judge: Hon. Samuel Conti  
 Courtroom: 1

[Complaint Filed: August 24, 2012]

1 Pursuant to Fed. R. Civ. P. 6(b)(1) and 16(b)(4); Civil L.R. 7-12, 6-1(b), and 6-2; and the  
2 Supporting Declaration of Daniel J. Weiss, it is hereby stipulated by and between Plaintiffs and  
3 Defendants (together the “Parties”), through their respective counsel, as follows:

4 WHEREAS, on July 27, 2015, the Court denied Plaintiffs’ Motion for Class Certification  
5 and ordered that Plaintiffs could file a new motion for class certification within 30 days, by  
6 August 26, 2015 (ECF No. 132);

7 WHEREAS, on August 26, 2015, Plaintiffs filed a Motion to Grant Request for  
8 Intervention and to File Fourth Amended Complaint (ECF Nos. 133, 134) (the “Intervention  
9 Motion”) and an Amended Motion for Class Certification (the “Class Certification Motion”);

10 WHEREAS, Defendants’ responses to both of Plaintiffs’ motions are currently due by  
11 September 9, 2015;

12 WHEREAS, Defendants intend to respond to the Intervention Motion separately from the  
13 Class Certification Motion and desire to set different briefing schedules for those motions;

14 WHEREAS, Defendants submit they require discovery to respond to the Class  
15 Certification Motion, including depositions of the two newly proposed plaintiffs, which must be  
16 coordinated with counsel’s and the witnesses’ schedules, and depending on Defendants’ response,  
17 Plaintiffs may require discovery, including depositions of any Declarants proffered by Defendants  
18 (both parties reserving the right to object to such discovery);

19 WHEREAS, the grounds for this stipulation are further set forth in the accompanying  
20 Declaration of Daniel J. Weiss.

21 NOW, THEREFORE, the Parties stipulate as follows:

22 1. That the Court enlarge the time for Defendants to respond to Plaintiffs’  
23 Intervention Motion (ECF No. 134) to September 23, 2015, and the time for Plaintiffs to reply to  
24 Defendants’ response to the Intervention Motion to October 14, 2015.

25 2. That the Court enlarge the time for Defendants to respond to Plaintiffs’ Class  
26 Certification Motion (ECF No. 133) to October 14, 2015, and the time for Plaintiffs to reply to  
27 Defendants’ response to the Class Certification Motion to November 19, 2015.  
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3. That the Court continue the hearing date on both motions to December 11, 2015 or another date available to the Court and counsel for the Parties.

Dated: September 3, 2015

JENNER & BLOCK LLP

By:                     /s/ Daniel J. Weiss                    

DANIEL J. WEISS

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Attorneys for Defendants

DOLLAR THRIFTY AUTOMOTIVE GROUP, INC., DOLLAR RENT A CAR, INC. and DTG OPERATIONS, INC.

1 Dated: September 3, 2015

WHATLEY KALLAS LLP

3 By:                   /s/ Alan M. Mansfield                  

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KRISTEN TOOL and Proposed Plaintiff-Intervenors  
Melinda Basker and Chanh Tran

21 **Filer's Attestation:** Pursuant to L.R. 5-1(i)(3), Daniel J. Weiss hereby attests that concurrence in  
22 the filing of this document has been obtained from all signatories.

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**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED that:

1. Defendants' Response to Plaintiffs' Motion To Grant Request For Intervention And To File Fourth Amended Complaint is due on September 23, 2015, and Plaintiffs' reply thereto is due on October 14, 2015.

2. Defendants' Response to Plaintiffs' Amended Motion For Class Certification is due on October 14, 2015, and Plaintiffs' reply thereto is due on November 19, 2015.

3. The date of the hearing for both motions is continued to December 11, 2015.

Dated: September 4, 2015

  
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The Hon. Samuel Conti  
United States District Judge