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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11 MAJEED SEIFI AND TRACEY
 12 DEAKIN, On Behalf Of Themselves
 And All Others Similarly Situated
 13
 Plaintiffs,
 14 v.
 15 MERCEDES-BENZ USA, LLC,
 16 Defendant.

No. 12-CV-05493 (TEH)

**STIPULATED REQUEST TO CONTINUE
 INITIAL CASE MANAGEMENT CONFERENCE
 AND RELATED DATES; DECLARATION OF
 CHAD A. STEGEMAN IN SUPPORT
 THEREOF; [~~PROPOSED~~] ORDER**

[N.D. CAL. L.R. 6-2]

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1 By and through their respective counsel of record, Plaintiffs Majeed Seifi and
2 Tracey Deakin, as individuals and on behalf of all others similarly situated, and Defendant
3 Mercedes-Benz USA, LLC (“MBUSA”) stipulate and agree as follows:

4 **STIPULATED REQUEST FOR ORDER CHANGING TIME PURSUANT TO L.R. 6-2**

5 1. On May 23, 2013, the Court issued an order granting in part and denying in
6 part MBUSA’s Motion to Dismiss. Dkt. 42. In its order, the Court gave plaintiffs leave
7 to amend their Complaint on or before June 21, 2013. *Id.*

8 2. Plaintiffs respectfully request, and MBUSA does not oppose, a two-week
9 extension of the filing deadline for filing their amended complaint, which would make the
10 amended complaint due by July 5, 2013. Likewise, plaintiffs do not oppose MBUSA’s
11 request for a corresponding two-week extension of time to file a response to the amended
12 complaint, including a renewed Motion to Dismiss, such that the response will be due 28
13 days after service of the amended complaint.

14 3. As set forth in the accompanying declaration of Chad A. Stegeman, this
15 extension request is being made in good faith because counsel for both plaintiffs and
16 MBUSA will be traveling extensively on other matters in the month of June.

17 4. The Court has also calendared the Case Management Conference for June 24,
18 2013, with the Joint Case Management Statement due on June 17, 2013, and has further
19 given the parties until June 3, 2013 to hold their Rule 26(f) conference.

20 5. Because the resolution of MBUSA’s response to the amended complaint will
21 remain pending by those dates, the parties further request that, in order to preserve judicial
22 resources and promote judicial economy, the Case Management Conference be continued
23 to August 23, 2013, with the Joint Case Management Statement due on August 16, 2013.
24 That continuance, in turn, would grant the parties up to and until August 2, 2013 to hold
25 their Rule 26(f) conference. The parties agree that the date for the exchange of initial
26 disclosures, currently set for June 17, 2013, will not be changed and will go forward as
27 scheduled.
28

1 6. Pursuant to prior stipulations between the parties, this Court has modified the
2 dates for the Case Management Conference, the Joint Case Management Statement, and
3 the Rule 26(f) conference pursuant to the stipulation of the parties on two prior occasions,
4 and has previously modified the briefing and hearing schedule in connection with
5 MBUSA's Motion to Transfer Venue. *See* Dkt. 8; Dkt. 17. This Court has also modified
6 the briefing and hearing schedule on MBUSA's Motion to Dismiss by its own order. *See*
7 Dkt. 15; Dkt. 28, Dkt. 35-36.

8 7. Pursuant to N.D. Cal. Local R. 6-2, the parties seek approval of this stipulated
9 request for an order changing time, as the agreements set forth herein affect certain dates
10 fixed by Court order and the Local Rules of this Court.

11 8. As there are no other scheduled matters in this case, the requested time
12 modification would have no effect on the schedule for the case.

13
14 Dated: June 3, 2013

Respectfully submitted,

CARROLL, BURDICK & McDONOUGH LLP

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16
17 By _____ /s/

CHAD A. STEGEMAN

18 Attorneys for Defendant
19 Mercedes-Benz USA, LLC

20
21 Dated: June 3, 2013

THE KATRIEL LAW FIRM, PLLC

22
23 By _____ /s/

ROY A. KATRIEL

24 Attorneys for Plaintiffs
25 Majeed Seifi and Tracey Deakin
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ORDER

For good cause shown, the Court hereby enters the Stipulation set forth above as the Order of the Court. The schedule in this case is hereby modified as follows:

a. The deadline for the filing of plaintiffs' amended complaint, currently set for June 21, 2013, shall be continued to July 5, 2013.

b. MBUSA shall have 28 days from the date of service of the amended complaint to file and serve its response to the amended complaint.

c. The initial case management conference in this matter, currently set for Monday, June 24, 2013, shall be continued to August ²⁶~~30~~, 2013.

d. The due date for the Joint Case Management Statement, currently set for June 17, 2013, shall be continued to August ¹⁹~~23~~, 2013.

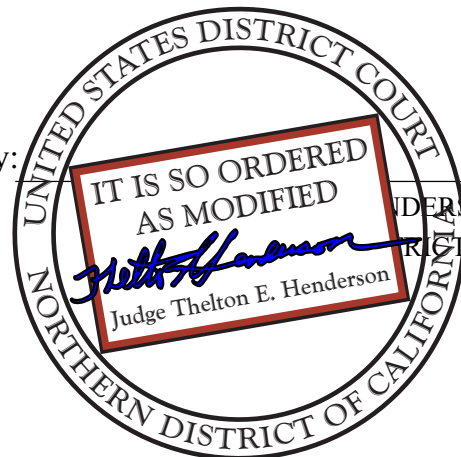
e. The last day to hold a Rule 26(f) Conference, currently set for June 3, 2013, shall be continued to August 2, 2013.

f. The deadline for the exchange of initial disclosures, currently set for June 17, 2013, shall remain unchanged.

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: 06/04, 2013

By: _____



HENDERSON
JUDGE