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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 (SAN FRANCISCO)

13 ENRICO MORETTI, individually and on
 14 behalf of Class Members,

15 Plaintiffs,

16 v.

17 THE HERTZ CORPORATION; HERTZ
 18 GLOBAL HOLDINGS, INC.; DOLLAR
 19 THRIFTY AUTOMOTIVE GROUP, INC.;
 20 HOTWIRE, INC.; and DOES 1 THROUGH
 21 25,

22 Defendants.

Case No. CV 13 2972

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND BRIEFING
 SCHEDULE FOR MOTIONS TO
 DISMISS**

IT IS SO ORDERED AS MODIFIED

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1 The parties to this action have conferred and reached agreement, subject to the approval
2 of the Court, to extend the briefing schedule for the currently pending motions to dismiss (Dkt.##
3 15, 17). In support of this stipulation, the parties recite and agree as follows:

4 WHEREAS on May 24, 2013, plaintiff Enrico Moretti (“Plaintiff”) filed this putative
5 class action in California state court (San Francisco county);

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7 WHEREAS on June 28, 2013, defendants The Hertz Corporation, Hertz Global Holdings,
8 Inc. (collectively “Hertz”), and Dollar Thrifty Automotive Group (“DTAG”) removed the action
9 to this Court pursuant to the Class Action Fairness Act, 28 U.S.C. §§ 1332(d) & 1453;

10 WHEREAS on July 3, 2013, Plaintiff, Hertz, and DTAG stipulated to extend the answer
11 date and to set an agreed to briefing schedule on the forthcoming motions to dismiss (Dkt.# 11);

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13 WHEREAS on July 3, 2013, this Court signed the parties’ stipulation, and set the
14 following briefing schedule for motions to dismiss:

- 15 (1) The date on which defendants shall answer or otherwise plead is extended until
16 August 5, 2013;
- 17 (2) If any defendant files a motion to dismiss on the answer date, plaintiff shall have
18 until August 26, 2013 to file a response to that motion;
- 19 (3) Defendant(s) shall have until September 6, 2013 to file a reply in support of the
20 motion(s) to dismiss; and
- 21 (4) The hearing on any motion to dismiss, should one be filed, shall be on
22 September 27, 2013.

23 (Dkt.# 12.)

24 WHEREAS on August 5, 2013, Defendant Hotwire, Inc. (“Hotwire”) filed a motion to
25 dismiss (Dkt.# 15);

26 WHEREAS Hertz and DTAG filed a joint motion to dismiss the same day (Dkt.# 17);

27 WHEREAS Defendants have agreed to provide Plaintiff with additional time to respond
28 to their motions to dismiss (Dkt.## 15, 17);

1 WHEREAS the parties urge the Court to accept their stipulated schedule as the product of
2 the parties' agreement and in the belief that it will lessen the burden on the Court;

3 IT IS HEREBY STIPULATED AND AGREED THAT, subject to Court approval:

- 4 (1) Plaintiff shall have until September 16, 2013 to file a response to Defendants'
5 motions to compel (Dkt.## 15, 17);
- 6 (2) Defendants shall have until September 26, 2013 to file a reply in support of their
7 motion to dismiss; and
- 8 (3) The hearing on the motions to dismiss shall be on October 10, 2013 or on any
9 date thereafter that the Court deems appropriate and convenient.

10 STIPULATED AND AGREED:

11 Dated: August 23, 2013

PLAINTIFF ENRICO MORETTI

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20 Dated: August 23, 2013

THE HERTZ CORPORATION, HERTZ GLOBAL
HOLDINGS, INC., AND DOLLAR THRIFTY
AUTOMOTIVE GROUP

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Dated August 23, 2013

HOTWIRE, INC.

By: /s/Rodney Strickland
Rodney G. Strickland, Jr.
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, California 94304
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ORDER

The parties having stipulated and good cause appearing, the Court adopts the parties' stipulated agreement and resets deadlines as follows:

- (1) Plaintiff shall have until September 16, 2013 to file a response to Defendants' motions to compel (Dkt.## 15, 17);
- (2) Defendants shall have until September 26, 2013 to file a reply in support of their motions to dismiss; and
- (3) The hearing on Defendants' motions to dismiss (Dkt.# 15, 17) shall be on October 11, 2013.

IT IS SO ORDERED.

Dated: 08/23/2013

