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12 *Plaintiffs' Interim Co-Lead Counsel*
 13
 14 *[Additional Counsel listed on*
Signature Page]

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN FRANCISCO DIVISION

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 20 IN RE MYFORD TOUCH CONSUMER
 LITIGATION
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No. 13-cv-3072-EMC

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING DEADLINES
 REGARDING DEFENDANT FORD
 MOTOR COMPANY'S MOTION TO
 DISMISS THE SECOND AMENDED
 COMPLAINT**

Judge: Hon. Edward M. Chen

1 TO THE HONORABLE EDWARD M. CHEN:

2 PLEASE TAKE NOTICE that pursuant to Civ. L.R. 6-1(b), 6-2, and 7-12, plaintiffs and
3 defendant Ford Motor Company (collectively, the “Parties”), by and through their respective
4 counsel, stipulate and agree as follows:

5 WHEREAS, defendant Ford Motor Company (“Ford”) filed a Motion to Dismiss the Second
6 Amended Complaint on June 22, 2015 (“Motion to Dismiss”) (Dkt. No. 157); and
7

8 WHEREAS, plaintiffs’ response to the Motion to Dismiss is currently due on July 6, 2015;
9 and

10 WHEREAS, Ford’s reply in support of the Motion to Dismiss is currently due on July 13,
11 2015; and

12 WHEREAS, because plaintiffs’ deadline for filing their response falls directly after the long
13 Fourth of July weekend, which begins on July 3, 2015, and in order to provide plaintiffs with
14 adequate time to respond and Ford adequate time to reply, the Parties have conferred and agreed
15 upon extending the deadline for plaintiffs to file their response, and the deadline for Ford to file its
16 reply; and
17

18 WHEREAS, the Parties have previously sought time modifications in this case on the
19 following occasions: to extend the time for Ford to respond to the initial Complaint (Dkt. Nos. 16
20 and 19); to extend the time for Ford to respond to the First Amended Complaint (“FAC”) (Dkt. Nos.
21 51, 101, and 105); to reschedule the hearing on Ford’s motion to dismiss the FAC (*see* Dkt. No. 63;
22 Dkt. Nos. 71 and 75); to reschedule the Further Case Management Conference (Dkt. Nos. 71 and 75;
23 *see also* Dkt. No. 110); to modify selected dates within the class certification schedule (*see* Dkt. Nos.
24 118 and 130); to extend the time for Ford to respond to the Second Amended Complaint (Dkt. No.
25 143); and to extend the time for Ford to submit a declaration in support of plaintiffs’ administrative
26 motion to file a document under seal (Dkt. No. 147).
27
28

1 WHEREAS, the Parties agree that the requested extension will not affect the schedule in this
2 case, or the hearing for the Motion to Dismiss, which is currently scheduled for August 20, 2015.

3 **IT IS HEREBY STIPULATED AND AGREED by the Parties as follows:**

- 4 1. Plaintiffs' deadline to file their response to Ford's Motion to Dismiss is extended through
5 and until July 13, 2015.
6
7 2. Ford's deadline to file its reply in support of the Motion to Dismiss is extended through
8 and until July 24, 2015.

9 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

10 DATED: June 26, 2015

11
12 *Plaintiffs' Counsel:*

13 /s/ Steve W. Berman
14 _____
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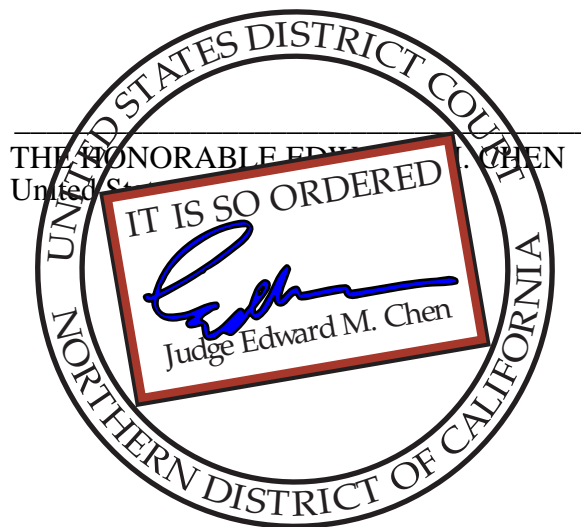
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

June 26, 2015

Dated: _____



ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Steve W. Berman, am the ECF User whose identification and password are being used to file the foregoing document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: June 26, 2015

/s/ Steve W. Berman
Steve W. Berman

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on June 26, 2015, I electronically filed the foregoing document using the
3 CM/ECF system which will send notification of such filing to the email addresses registered in the
4 CM/ECF system.

5 Dated: June 26, 2015

6 /s/ Steve W. Berman

Steve W. Berman

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