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11 Attorneys for Defendant
 FORD MOTOR COMPANY

13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**
 15 **SAN FRANCISCO DIVISION**

17 In re:
 18 MYFORD TOUCH CONSUMER
 19 LITIGATION

Case No. 3:13-CV-3072-EMC

**STIPULATION AND ~~PROPOSED~~ ORDER
 REGARDING MODIFICATIONS TO CASE
 MANAGEMENT CONFERENCE DATE,
 AND DISCOVERY AND CLASS
 CERTIFICATION DEADLINES**

[N.D. CAL. L.R. 7-11]

Judge: Hon. Edward M. Chen

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1 WHEREAS, the current fact discovery deadline in this matter is December 9, 2015;

2 WHEREAS, the amount of fact discovery exchanged in the litigation has been particularly
3 voluminous, both in terms of documents and depositions;

4 WHEREAS, Ford and Plaintiffs have been working together cooperatively to complete
5 the fact discovery process in this litigation, and Ford and Plaintiffs have resolved nearly all
6 discovery issues without need for this Court's intervention;

7 WHEREAS, Plaintiffs have requested additional Rule 30(b)(6) testimony from Ford on
8 certain pricing and related issues, and the parties have agreed that Dennis Curlew, Ford's
9 designee, will be produced for deposition on December 15, 2015;

10 WHEREAS, Plaintiffs have requested the deposition of Graydon Reitz, who resides in
11 Australia, and Ford has agreed to make Mr. Reitz available for deposition on January 21, 2016,
12 during his next earliest trip to the United States;

13 WHEREAS Ford requires additional time to complete the voluminous privilege review
14 and production of its final privilege log (along with any responsive documents ultimately
15 determined not to be privileged in the final privilege review);

16 WHEREAS, Ford and Plaintiffs require very modest extensions of various existing
17 deadlines set in this case to complete the additional discovery listed above and to accommodate
18 related expert reports and filings consistent with those dates;

19 WHEREAS, none of the various deadline extensions stipulated by Ford and Plaintiffs will
20 require any change to the dates set for trial of the matter;

21 WHEREAS, Lead Counsel for Ford has a conflict with the date of the next Case
22 Management Conference, scheduled for December 17, because a summary judgment argument in
23 another court has been scheduled for the same day;

24 WHEREAS, Counsel for Ford obtained from the Court's Scheduling Clerk potential
25 alternative dates for a Case Management Conference, subject to Court approval, and has
26 discussed those dates with Plaintiffs' counsel;

27 WHEREAS, execution of this Stipulation is not a waiver of any claims or defenses
28 Plaintiffs or Ford otherwise may have;

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2016 from May 12, 2016.

Dated: November 24, 2015

O'MELVENY & MYERS LLP

By: /s/ Randall W. Edwards
Randall W. Edwards

Attorneys for Defendant Ford Motor Company

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Dated: November 24, 2015

BARON & BUDD, P.C.

By: /s/ Mark Pifko
Mark Pifko

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Plaintiffs' Interim Co-Lead Counsel

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FILER'S ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that the other signatory listed, on whose behalf the filing is submitted, concurs in the filing's content and has authorized the filing.

Dated: November 24, 2015

Randall W. Edwards
O'MELVENY & MYERS LLP

By: /s/ Randall W. Edwards
Randall W. Edwards
Attorney for Defendant Ford Motor Company

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. (Modified on p. 2)

DATED: November ²⁵ __, 2015

