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12	FORD MOTOR COMPANY			
13	UNITED STATES DISTRICT COURT			
14	NORTHERN DIS	TRICT OF CALIFORNIA		
15	SAN FRANCISCO DIVISION			
16				
17	In re:	Case No. 3:13-CV-3072-EMC		
18	MYFORD TOUCH CONSUMER	STIPULATION AND [PROPOSED] ORDER REGARDING MODIFICATIONS TO CASE		
19	LITIGATION	MANAGEMENT CONFERENCE DATE, AND DISCOVERY AND CLASS		
20		CERTIFICATION DEADLINES		
21		[N.D. CAL. L.R. 7-11]		
22		Judge: Hon. Edward M. Chen		
23				
24		J		
25				
26				
27				
28				
		STIPULATION REGARDING CMC, DISCOVERY &		

CLASS CERTIFICATION DEADLINES

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;	

1	WHEREAS, the parties reserve the right to seek further modification of the above dates		
2	should the depositions of Messrs. Curlew and Reitz require so; and		
3	WHEREAS, Local Rule 7-11 permits a party to seek miscellaneous administrative relief		
4	pursuant to a stipulation by the parties;		
5	THEREFORE, IT IS HEREBY STIPULATED by Plaintiffs and Ford, through their		
6	counsel of record, subject to the approval of the Court, as follows:		
7	1.	The fact discovery deadline in this matter is extended from December 9, 2015 to	
8		January 21, 2016 solely for the purpose of allowing Plaintiffs to complete the	
9		depositions of Ford's 30(b)(6) designee Dennis Curlew and Graydon Reitz and for	
10		Ford to complete and produce any outstanding portions of Ford's privilege log;	
11	2.	The December 9, 2015 fact discovery deadline remains in place for all other fact	
12		discovery matters;	
13	3.	Plaintiffs' deadline for producing the disclosure and report of their economic	
14		expert witness(es) with respect to class certification is moved to January 7, 2016,	
15		but Plaintiffs' other class certification expert disclosures (i.e. non-economic expert	
16		witnesses) and reports remain due on November 28, 2015;	
17	4.	The next Case Management Conference in this matter is continued to January 28,	
18		2016 from December 17, 2015. The deadline to file an updated joint status report	
19		is extended to January 21, 2016 from December 10, 2015.	
20	5.	Plaintiffs' deadline for filing their motion for class certification is extended to	
21		January 28, 2016 from January 14, 2016;	
22	6.	Ford's deadline for responding to Plaintiffs' class certification motion and for	
23		producing class certification expert disclosures and reports is extended to March	
24		15, 2016 from March 3, 2016;	
25	7.	Plaintiffs' deadline to submit a reply brief in support of their motion for class	
26		certification and their rebuttal expert disclosures and reports is extended to May 2,	
27		2016 from April 21, 2016; and	
28	8.	The hearing on Plaintiffs' motion for class certification is extended to May 19.	

1	2016 from May 12, 2016.	
2	D (1 N 1 24 2015	
3	Dated: November 24, 2015	O'MELVENY & MYERS LLP
4		Dry /a/ Day doll W. Edwards
5		By: /s/ Randall W. Edwards Randall W. Edwards
6		Attorneys for Defendant Ford Motor Company
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1	Dated: November 24, 2015	BARON & BUDD, P.C.
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25		Plaintiffs' Interim Co-Lead Counsel
26		1 Idintiffs Interim Co-Lead Counsel
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28		

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: <u>/s/ 1</u>

/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 ____, 2015

