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 FORD MOTOR COMPANY  
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13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**  
 15 **SAN FRANCISCO DIVISION**  
 16

17 In re:  
 18 MYFORD TOUCH CONSUMER  
 19 LITIGATION

Case No. 3:13-CV-3072-EMC  
**STIPULATION AND ~~PROPOSED~~ ORDER  
 REGARDING MODIFICATIONS TO  
 CERTAIN DISCOVERY DEADLINES**  
  
**[N.D. CAL. L.R. 7-11]**  
  
 Judge: Hon. Edward M. Chen

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1           WHEREAS, the fact discovery deadline in this matter was December 9, 2015, and the  
2 time to raise any discovery disputes about that discovery is December 16, 2015;

3           WHEREAS, this Court, pursuant to stipulation, extended that fact discovery deadline only  
4 for certain specific purposes: for Plaintiffs to take two additional depositions, and for Ford to  
5 complete its privilege review (*see* ECF No. 186);

6           WHEREAS, Plaintiffs provided initial discovery responses to certain interrogatories and  
7 supplemental responses to other, prior interrogatories on December 9, 2015, and, following the  
8 parties' discussions have requested additional time to complete further their responses to Ford's  
9 interrogatories in light of the foregoing extensions and other discussions;

10           WHEREAS, the amount of fact discovery exchanged in the litigation has been particularly  
11 voluminous, both in terms of millions of pages of documents and dozens of depositions;

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

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

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

19           WHEREAS, Local Rule 7-11 permits a party to seek miscellaneous administrative relief  
20 pursuant to a stipulation by the parties;

21           THEREFORE, IT IS HEREBY STIPULATED by Plaintiffs and Ford, through their  
22 counsel of record, subject to the approval of the Court, as follows:

- 23           1.     The deadline for Plaintiffs to submit supplemental responses to Ford's  
24                 interrogatories is extended to January 13, 2016;
- 25           2.     The deadline for Plaintiffs to submit additional supplemental responses, if any, to  
26                 Ford's interrogatories, based on any information learned or received after the date  
27                 of this stipulation, is extended to January 25, 2016;

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- 3. The deadline for Ford and Plaintiffs to file a jointly-signed letter<sup>1</sup> regarding any disputes previously raised by the parties about Plaintiffs’ responses to Ford’s interrogatories, or about any of Plaintiffs’ upcoming supplemental responses, is extended to January 29, 2016.
- 4. All other discovery deadlines in this case shall remain the same.

Dated: December 16, 2015

**O’MELVENY & MYERS LLP**

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

Attorneys for Defendant Ford Motor Company

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<sup>1</sup> Pursuant to Magistrate Judge James’s Discovery Standing Order.

1 Dated: December 16, 2015

**GRANT & EISENHOFER P.A.**

2  
3 By: /s/ Kyle McGee  
4 Kyle McGee

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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: December 16, 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.

DATED: December <sup>23</sup> \_\_, 2015

