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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 MODIFICATION TO  
 DEADLINE TO FILE RESPONSIVE  
 DECLARATION REGARDING MOTION  
 TO SEAL CLASS CERTIFICATION BRIEF**

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

Judge: Hon. Edward M. Chen

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1           WHEREAS, Plaintiffs will file their motion for class certification and memorandum of  
2 law in support thereof on Thursday, January 28, 2016;

3           WHEREAS, this Court, pursuant to stipulation, extended the page limit for that  
4 memorandum of law to fifty pages (*see* ECF No. 192);

5           WHEREAS, Plaintiffs have stated their intent to cite numerous documents in their class  
6 certification papers that have been designated by Ford as Protected Documents pursuant to the  
7 protective order entered in this case (ECF No. 96), or will make assertions that are derived from  
8 such Protective Documents;

9           WHEREAS, pursuant to the Protective Order and Local Rule 79-5, Plaintiffs shall file  
10 their papers as partially redacted so as not to disclose the contents of the Protected Documents,  
11 and will file a motion to seal the redacted information;

12           WHEREAS, Ford is required to file a responsive declaration supporting the sealing of the  
13 Protected Documents or information derived therefrom in Plaintiffs' papers within four days after  
14 they are filed (*see* ECF No. 96 at 6);

15           WHEREAS, two of the four days provided for Ford to file the responsive declaration  
16 supporting the sealing of the Protected Documents coincide with a weekend;

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

19           WHEREAS, the deadline extension stipulated to by Ford and Plaintiffs will require no  
20 change to the dates set for trial of the matter;

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

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

- 25           1.     The deadline for Ford to file a responsive declaration to establish that certain  
26                 material in Plaintiffs' class certification papers is sealable is extended to  
27                 February 5, 2016.

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Dated: January 26, 2016

**O'MELVENY & MYERS LLP**

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

Attorneys for Defendant Ford Motor Company

1 Dated: January 26, 2016

**HAGENS BERMAN SOBOL SHAPIRO  
LLP**

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3 By: /s/ Craig Spiegel  
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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: January 26, 2016

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: January 2/3, 2016

