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Whalen v. Ford Motor Company

STIPULATION

This Stipulation and [Proposed] Order is entered into by and between Plaintiffs' interim colead counsel and counsel for Defendant Ford Motor Company ("Ford") (collectively, the "Parties"), as follows:

WHEREAS, Ford filed a Motion to Dismiss (Dkt. No. 56) to be heard on February 27, 2014. WHEREAS, at the Initial Case Management Conference held on January 23, 2014, the Parties stipulated in Court to reschedule the hearing on Ford's Motion to Dismiss from February 27, 2014 to April 3, 2014 at 1:30 p.m. *See* Civil Minutes (Dkt. No. 63).

WHEREAS, the Civil Minutes from the Initial Case Management Conference dated January 24, 2014 reset the Motion to Dismiss Hearing for April 3, 2014 at 1:30 p.m.

WHEREAS, the Civil Minutes from the Initial Case Management Conference dated January 24, 2014 scheduled a Further Case Management Conference for April 3, 2014 at 1:30 p.m. and ordered an updated Joint Case Management Statement to be filed by March 27, 2014.

WHEREAS, on February 21, 2014, the Court issued a Clerk's Notice resetting motion and CMC from April 3, 2014 to April 10, 2014 at 1:30 p.m. (Dkt. No. 68). This text only entry set the deadline for filing the Joint Case Management Statement to April 3, 2014 and scheduled the Further Case Management Conference for April 10, 2014 at 1:30 p.m.

WHEREAS, the Parties have met and conferred in good faith regarding scheduling and stipulate, subject to Court approval, to continue the Hearing on Ford's Motion to Dismiss to April 24, 2014.

WHEREAS, the Parties have met and conferred in good faith regarding scheduling and stipulate, subject to Court approval, to continue the Further Case Management Conference to April 24, 2014 and to file an updated Joint Case Management Statement by April 17, 2014.

STIPULATION AND [PROPOSED] ORDER RESCHEDULING HEARING ON DEFENDANT'S MOTION TO DISMISS AND CONTINUING CASE MANAGEMENT CONFERENCE - 1 $\,$

Case No.: 13-cv-3072-EMC 010388-11 678209 V1

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15 16	By <u>/s/ Randall W. Edwards</u>
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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: March 14, 2014 HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Steve W. Berman
STEVE W. BERMAN

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: March _____, 2014



STIPULATION AND [PROPOSED] ORDER RESCHEDULING HEARING ON DEFENDANT'S MOTION TO DISMISS AND CONTINUING CASE MANAGEMENT CONFERENCE - 4

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