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23 **UNITED STATES DISTRICT COURT**
 24 **NORTHERN DISTRICT OF CALIFORNIA**

25 KIWANNA MCCLAIN GATHRON,
 26
 27 Plaintiff,
 28
 vs.
 29
 30 CHRYSLER GROUP LLC,
 31
 32 Defendant.

33 Case No. 3:13-cv-05922-WHO

34 **STIPULATION AND ORDER TO**
 35 **RESCHEDULE CASE MANAGEMENT**
 36 **CONFERENCE**

37 N.D. Cal Local Rules 6-1(b) and 6-2

38 Date: May 27, 2014
 39 Time: 2:00 P.M.
 40 Judge: Hon. William H. Orrick
 41 Courtroom: 2, 17th Floor

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14 Attorneys for Defendant Chrysler Group LLC

1 This stipulation is entered into by Plaintiff Kiwana McClain Gathron and Defendant Chrysler
2 Group LLC, by and through their respective counsel, with reference to the following facts and recitals:

- 3 1. Plaintiff filed her proposed class action complaint on December 20, 2013, alleging that
4 the headlight harnesses in 2011 and 2012 Dodge Chargers are defective;
- 5 2. Chrysler filed a motion to dismiss Plaintiff's complaint on February 19, 2014;
- 6 3. As the parties reported in their joint case management conference statement, (Dkt. # 32),
7 because Chrysler issued a recall of the 2011 and 2012 Dodge Charger vehicles built
8 between May 20, 2010 and November 8, 2011, the parties decided to focus their
9 preliminary discovery efforts on the recall and its effect on this litigation;
- 10 4. At the case management conference on March 25, 2014, the Court vacated the hearing on
11 defendant's motion to dismiss in order to allow the parties to focus on this limited
12 discovery; (Dkt. # 36);
- 13 5. Chrysler has begun its production of documents responsive to Plaintiff's discovery
14 requests, and anticipates completing its production by May 22, 2014, three days before
15 the scheduled case management conference;
- 16 6. Plaintiff has committed to promptly reviewing the production once it is completed and
17 evaluating whether all of her litigation goals have been achieved and this case can be
18 dismissed voluntarily;
- 19 7. However, because Chrysler anticipates completing its production only a few days before
20 the case management conference, the parties jointly request that the conference be reset
21 to allow Plaintiff's review and evaluation to be completed before the parties return to
22 Court;
- 23 8. The parties therefore request that the Court reschedule the case management conference
24 scheduled for May 27, 2014, to June 24, 2014, with the parties to file their joint CMC
25 statement by June 17, 2014.

26 **NOW, THEREFORE**, the parties hereby stipulate and agree, subject to Court approval, that the
27 parties shall have until June 17, 2014, to file their joint case management conference statement, and that
28 the case management conference is reset to June 24, 2014.

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DATED: May 16, 2014

PRITZKER | LAW

By: /s/ Elizabeth C. Pritzker

Elizabeth C. Pritzker
Attorneys for Plaintiff Kiwana McClain Gathron

DATED: May 16, 2014

GIRARD GIBBS LLP

By: /s/ Dylan Hughes

Dylan Hughes
Attorneys for Plaintiff Kiwana McClain Gathron

DATED: May 16, 2014

SEDGWICK LLP

By: /s/ Wayne A. Wolff

Wayne A. Wolff
Attorneys for Chrysler Group LLC

DATED: May 16, 2014

THOMPSON COBURN LLP

By: /s/ John W. Rogers

John W. Rogers
Attorneys for Chrysler Group LLC

ATTESTATION

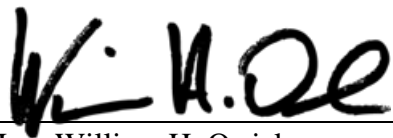
I, Elizabeth C. Pritzker, am the ECF User whose ID and password are being used to file this document. In compliance with Local Rule 5-1(i)(3), I hereby attest that all other signatories listed have concurred in this filing.

/s/ Elizabeth C. Pritzker
Elizabeth C. Pritzker

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PURSUANT TO STIPULATION, IT IS ORDERED that the parties shall have until June 17, 2014, to file their joint case management conference statement, and that the case management conference is reset to June 24, 2014.

Dated: May 16, 2014



Hon. William H. Orrick
United States District Judge