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 16 THIEMAN TAILGATES, INC.

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 SAN FRANCISCO DIVISION

20 MICHAEL SULLIVAN,
 21 Plaintiff,
 22 v.
 23 FORD MOTOR COMPANY; THIEMAN
 TAILGATES, INC.; and DOES ONE through
 24 FIFTY, Inclusive,
 25 Defendants.

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Attorneys for Defendant
 FORD MOTOR COMPANY

Case No. 3:16-cv-03505-JST

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO CONTINUE INITIAL CASE
 MANAGEMENT CONFERENCE AND TO
 EXTEND TIME FOR DEFENDANT FORD
 MOTOR COMPANY TO RESPOND TO
 FIRST AMENDED COMPLAINT**

1 Pursuant to Civil L.R. 6-2, counsel of record for Plaintiff Michael Sullivan, Defendant Ford
2 Motor Company (“Ford”) and Defendant Thieman Tailgates, Inc. (collectively “the Parties”) hereby
3 stipulate to:

4 (1) continue the Initial Case Management Conference currently scheduled for October 5,
5 2016 at 2:00pm to November 9, 2016 at 2:00pm or as soon thereafter as is convenient for
6 the Court.

7 (2) Continue the corresponding deadlines accordingly as follows:

8 a. 10/19/16 - Last day to complete Rule 26(f) conference.

9 b. 10/31/16 – Last day to file Joint CMC Statement.

10 c. 11/2/16 – Deadline to exchange initial disclosures and to submit Rule 26(f)
11 Report.

12 (3) continue the following ADR selection process deadlines as set forth in the Court’s June
13 24, 2016 Order by 30 days.

14 Plaintiff Michael Sullivan and Ford further stipulate to extend Ford’s deadline to respond to
15 Plaintiff’s First Amended Complaint from August 15, 2016 to September 6, 2016.

16 As set forth in the accompanying declaration of Joan R. Camagong, good cause exists to
17 continue the Initial Case Management Conference due to Plaintiff’s counsel’s trial conflict. Further,
18 good cause also exists to extend Ford’s deadline to respond to Plaintiff’s First Amended Complaint
19 as it raises complex legal issues that require additional time for Ford to prepare its response.

20 There have been no prior time modifications in this case.

21 The Parties believe that continuing the Initial Case Management Conference and all
22 corresponding deadlines triggered by the Initial Case Management Conference will not prejudice the
23 Parties at this stage of the litigation.

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Date: August 10, 2016

Respectfully submitted,

LAW OFFICES OF JOHN R. BOBAY
MICHAEL POLCKI LAW GROUP

By: /s/Michael J. Plocki
MICHAEL J. PLOCKI

Attorneys for Plaintiff
MICHAEL SULLIVAN

Date: August 10, 2016

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Joan R. Camagong
JOAN R. CAMAGONG

Attorneys for Defendant
FORD MOTOR COMPANY

Date: August 10, 2016

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH
LLP

By: /s/ Nicole L. Jones
NICOLE L. JONES

Attorneys for Defendant
THIEMAN TAILGATES, INC.

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SIGNATURE ATTESTATION

I, Joan R. Camagong, am the ECF User whose ID and password are being used to file this STIPULATION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE AND TO EXTEND TIME FOR DEFENDANT FORD MOTOR COMPANY TO RESPOND TO FIRST AMENDED COMPLAINT. In compliance with Local Rule 5-1(i), I hereby attest that Plaintiff's counsel and Defendant Thieman Tailgates, Inc.'s counsel have concurred in this filing.

DATED: August 10, 2016

SHOOK, HARDY & BACON, L.L.P.

By: /s/ Joan R. Camagong

JOAN R. CAMAGONG

Attorneys for Defendant
FORD MOTOR COMPANY

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: August 12, 2016



JON S. TIGAR
UNITED STATES DISTRICT JUDGE