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7 Attorneys for Plaintiff

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO COURTHOUSE

12 **Weerachai Chaiwong**, an individual;
 13 Plaintiff,
 14 v.
 15 **Hanlees Fremont, Inc.**, a California corporation,
 dba **Hanlees Fremont Hyundai**;
 16 **Ally Financial, Inc.**, a Delaware corporation;
 and
 17 **Does 1 through 75**, inclusive,
 18 Defendants.

Case No. 3:16-cv-04074-HSG

**Stipulated Request for Order Continuing the
 Case Management Conference and Other
 Pending Deadlines (Civil L.R. 6-2);
 [PROPOSED] Order**

Judge: Hon. Haywood S. Gilliam, Jr.
 Courtroom: 10

Complaint Filed: May 25, 2016
 Removed: July 20, 2016

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1 Plaintiff Weerachai Chaiwong, Defendant Hanlees Fremont, Inc., dba Hanlees Fremont Hyundai,
2 and Defendant Ally Financial, Inc., hereinafter collectively referred to as the Parties, by and through their
3 respective attorneys of record, hereby enter into the following Stipulation.

4 WHEREAS, Plaintiff filed the instant action in California state court on May 25, 2016.

5 WHEREAS, Defendant Ally removed the instant action on July 20, 2016. Defendant Ally moved
6 to dismiss Plaintiff's Complaint. Plaintiff filed a First Amended Complaint. Defendant Ally moved to
7 dismiss Plaintiff's First Amended Complaint, which is set for hearing on December 15, 2016.

8 WHEREAS, Defendant Hanlees appeared in the action on September 26, 2016, by answering and
9 filing a cross-complaint against Defendant Ally.

10 WHEREAS, the pleadings are not at issue to all parties.

11 WHEREAS, a case management statement is due by October 18, 2016.

12 WHEREAS, a case management conference (CMC) is currently set for October 25, 2016.

13 WHEREAS, the Parties agree that a continuance of the CMC to December 15, 2016, will permit
14 more efficient case management, will serve the interests of judicial economy, and will conserve the resources
15 of the Parties and the Court.

16 WHEREAS, the Parties have not previously requested any CMC continuances.

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18 THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate and agree, through
19 their respective counsel, as follows:

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21 1. The October 18, 2016, CMC shall be taken off calendar, and rescheduled for December 15,
22 2016, or another date that is convenient for the Court's schedule.

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24 2. The deadline to file the case management statement shall be continued to seven days prior
25 to the new date for the CMC.

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IT IS SO STIPULATED.

October 13, 2016

Glassey | Smith

By: /s/ Joshua C. Anaya

Joshua C. Anaya
Attorneys for Plaintiff

October 13, 2016

Law Offices of Martin Putnam

By: /s/ Maritn Putnam

Martin Putnam
Attorneys for Defendant Hanlees
Fremont, Inc.

October 13, 2016

Severson & Werson

By: /s/ Mary Kate Kamka

Mary Kate Kamka
Attorneys for Defendant Ally
Financial, Inc.

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~~PROPOSED~~ Order

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATE: October 13, 2016

By: 
Hon. Haywood S. Gilliam, Jr.