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 9 Hanlees Fremont, Inc.

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**  
 12 **SAN FRANCISCO COURTHOUSE**

13 Weerachai Chaiwong, an individual,

14 Plaintiff,

15 v.

16 Hanlees Fremont, Inc., a California corporation,  
 17 dba Hanlees Fremont Hyundai;  
 18 Ally Financial, Inc., a Delaware corporation; and  
 19 Does 1 through 75, inclusive,  
 20 Defendants.

) Case No. 3:16-cv-04074-HSG  
 )  
 ) STIPULATION AND ~~PROPOSED~~ ORDER  
 ) Extending Time for Hanlees Fremont, Inc. to  
 ) Respond to Ally Financial, Inc.'s Notice of  
 ) Motion and Motion to Dismiss  
 ) Cross-Claims, and to Extend Time for  
 ) Ally's Reply Thereto  
 )  
 ) [Civil L.R. 6-1(b), 6-2, 7-12]  
 )  
 ) Hearing Date: January 26, 2017  
 ) Time: 2:00 p.m.  
 ) Judge: Hon. Haywood S. Gilliam, Jr.  
 ) Courtroom: 10

21 Action Filed: May 25, 2016  
 22 Removed: July 20, 2016

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23 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Defendant Hanlees Fremont,  
 24 Inc. ("Hanlees") and Defendant Ally Financial Inc. ("Ally") (together, "the affected  
 25 parties") by and through their respective counsel of record, hereby stipulate as follows:  
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**STIPULATION AND ~~PROPOSED~~ ORDER**

WHEREAS, Defendant Ally Financial filed a Notice of Motion and Motion to Dismiss the Cross-Claims of Defendant Hanlees Fremont, Inc. (“Motion to Dismiss”) on November 7, 2016;

WHEREAS, Hanlees’ response to the Motion to Dismiss is presently due for filing and service on a stipulated extended date of December 5, 2016, and Ally’s reply to Hanlees’ response is presently due on a stipulated extended date of December 19, 2016;

WHEREAS, Ally has agreed to extend Hanlees’ time to respond to the Motion to Dismiss by an additional fourteen (14) days, until December 19, 2016, to allow Hanlees sufficient time to respond in view of medical restrictions on activities of co-counsel Louis Liberty, on advice of neurologist Josiah Bartlett Ambrose, M.D. [Civil L.R. 6-2(a)(1)];

WHEREAS, Hanlees has agreed to extend Ally’s time to reply to Hanlees’ response to the Motion to Dismiss by an additional sixteen (16) days after the stipulated new due date for Hanlees’ response, until January 7, 2017, to allow Ally sufficient time to reply to Hanlees’ response to the Motion to Dismiss in view of Ally’s counsel’s trial schedule and the intervening holidays [Civil L.R. 6-2(a)(1)];

WHEREAS, one previous two-week extension of time for Hanless to respond to the Motion to Dismiss, and a corresponding extension of time for Ally to reply, were stipulated by the affected parties and filed in this docket on November 21, 2016 [Civil L.R. 6-2(a)(2)];

WHEREAS, the requested extensions will not have any effect on the current schedule for the case [Civil L.R. 6-2(a)(3)];

WHEREAS, a Court order is required for the requested extensions, in that they involve papers required to be filed with the Court [Civil L.R. 6-1(b)];

1 IT IS HEREBY STIPULATED TO, by and between the Parties herein, through  
2 their respective attorneys of record, AND THE COURT IS REQUESTED TO ORDER,  
3 that Hanlees shall have an additional fourteen (14) day extension, up to and including  
4 December 19, 2016, in which to file and serve a response to Ally's Motion to Dismiss;  
5 and Ally shall have (16) days thereafter, up to and including January 7, 2017, in which to  
6 file and serve a reply to Hanlees' response.

7 This Stipulation is made without prejudice to, or waiver of, any rights or defenses  
8 otherwise available to the Parties in this action.

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10 DATED: December 5, 2016 SEVERSON & WERSON  
11 A Professional Corporation

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13 By:   /s/ Erik Kemp    
14 Erik Kemp  
15 Attorneys for Defendant ALLY FINANCIAL INC.

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17 LAW OFFICES OF MARTIN PUTNAM

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19 Dated: December 5, 2016 By:   /s/ Martin S. Putnam    
20 Martin S. Putnam  
21 Attorneys for Defendant and Cross-Complainant  
22 HANLEES FREMONT, INC.

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24  
25 Dated: December   7  , 2016 By:   Haywood S. Gilliam, Jr.    
26 Judge Haywood S. Gilliam, Jr.  
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