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Attorneys for Defendant  
 8 ALLY FINANCIAL INC.

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

11  
 12 WEERACHAI CHAIWONG, an individual,

13 Plaintiff,

14 vs.

15 HANLEES FREMONT, INC., a California  
 Corporation, dba HANLEES FREMONT  
 16 HYUNDAI; ALLY FINANCIAL, INC., a  
 Delaware Corporation; and DOES 1 through  
 17 75, inclusive,

18 Defendants.

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

**STIPULATION AND ORDER TO  
 EXTEND TIME FOR ALLY FINANCIAL  
 INC. TO FILE ITS REPLY IN SUPPORT  
 OF ITS MOTION TO DISMISS THE  
 CROSS CLAIMS OF DEFENDANT  
 HANLEES FREMONT, INC., PURSUANT  
 TO LOCAL RULE 6-1(b)**

Action Filed: May 25, 2016  
 Alameda Superior  
 Removed to USDC, ND of California:  
 July 20, 2016

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 20 Pursuant to Local Rule 6-1(b), Defendant Hanlees Fremont, Inc. (“Hanlees”) and  
 21 Defendant Ally Financial Inc. (“Ally”) (together, the “Parties”) by and through their respective  
 22 counsel of record, hereby stipulate as follows:

23 **STIPULATION**

24 WHEREAS, Hanlees filed cross claims against Ally in connection with its answer to  
 25 Plaintiff Weerachai Chaiwong’s complaint on September 26, 2016 (see Dkt. No. 25);

26 WHEREAS, the parties previously stipulated to an extension of Ally’s deadline to file its  
 27 response to Hanlees’ cross claims on October 13, 2016 (See Dkt. no. 32);

28 WHEREAS, Ally filed a motion to dismiss Hanlees’ cross claims on November 7, 2016

1 that is set to be heard on January 26, 2017;

2 WHEREAS, the parties previously stipulated to two extensions for Hanlees to file its  
3 opposition to Ally's motion to dismiss and to two extensions for Ally to file its reply thereto;

4 WHEREAS, the first stipulated request for an extension of both deadlines was made on  
5 November 21, 2016. (See Dkt. No. 37.) The request was refiled on December 2, 2016 after notice  
6 from the court of an electronic filing error. (See Dkt. No. 38.) The Court retroactively granted  
7 this request on December 7, 2016, and set Hanlees' opposition deadline as December 5, 2016 and  
8 Ally's reply deadline as December 19, 2016. (See Dkt. No. 41.);

9 WHEREAS, the second stipulated request for an extension of both deadlines was made on  
10 December 5, 2016. (See Dkt. No. 39.) The Court granted this request on December 7, 2016, and  
11 set Hanlees' opposition deadline as December 19, 2016 and Ally's reply deadline as January 7,  
12 2017. (See Dkt. No. 42.);

13 WHEREAS, Hanlees filed its opposition to Ally's motion to dismiss on December 19,  
14 2016 (See Dkt. No. 46);

15 WHEREAS, Ally's reply brief in support of its motion to dismiss Hanlees' cross claims is  
16 currently due on January 7, 2017;

17 WHEREAS, Hanlees has agreed to an extension of Ally's time to file its reply brief by ten  
18 (10) days or until January 17, 2017 to accommodate Ally's counsel's trial and holiday vacation  
19 schedule (see Kamka Decl. in support of stipulation, ¶¶ 1-2);

20 WHEREAS, this extension will not have any effect on the current schedule for the case.

21 IT IS HEREBY STIPULATED TO, by and between the Parties herein, through their  
22 respective attorneys of record, that Ally will have a ten (10) day extension, up to and including  
23 January 17, 2017, in which to file and serve its reply in support of its motion to dismiss Hanlees'  
24 cross claims.

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

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