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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 JOSE CHAVEZ, et al.,

11 Plaintiffs,

12 v.

13 FCA US LLC, et al.,

14 Defendants.

No. 3:16-cv-06909-EMC

15 STIPULATION AND [~~PROPOSED~~]
 ORDER SELECTING ADR PROCESS

16 On February 10, 2017, the parties filed a Stipulation and Proposed Order to stay this action
 17 pending a decision by the Judicial Panel on Multidistrict Litigation on whether to centralize this
 18 action with a number of other similar actions in a multidistrict litigation (“MDL”; the “MDL
 19 Motion”); and

20 Counsel report that they have met and conferred regarding ADR and have reached the
 21 following stipulation pursuant to Civil L.R. 16-8 and ADR L.R. 3-5. The parties agree to participate
 22 in the following ADR process:¹

23 **Private ADR:** Private mediation by a mediator to be agreed upon by the parties.

24 **Other requested deadline:** The parties agree to hold the ADR session by a date to be
 25 determined after a decision has been rendered on the MDL Motion and after the operative complaint
 26 has been tested on motion(s) to dismiss.

27 _____
 28 ¹ By entering into this stipulation, Defendants do not waive, and expressly preserve, all defenses,
 including all defenses concerning jurisdiction, service or otherwise.

1 Dated: February 14, 2017

HAGENS BERMAN SOBOL SHAPIRO LLP

2 /s/ Steve W. Berman

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7 *Attorneys for Plaintiffs*

8 Dated: February 14, 2017

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15 *Attorneys for Defendant FCA US LLC*

16 Dated: February 14, 2017

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21 *Attorney for Defendant Robert Bosch LLC*

22 **Attestation Pursuant to Local Rule 5-1(i)(3):**

23 I, Steve W. Berman, am the ECF User whose identification and password are being used to
24 file the foregoing document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all
signatories have concurred in this filing.

25 Dated: February 14, 2017

HAGENS BERMAN SOBOL SHAPIRO LLP

26 /s/ Steve W. Berman

Steve W. Berman (*Pro Hac Vice*)

27 *Attorney for Plaintiffs*

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/15/17

