

1 Jennie Lee Anderson (SBN 203586)
 2 Lori E. Andrus (SBN 205816)
ANDRUS ANDERSON LLP
 3 155 Montgomery Street, Suite 900
 San Francisco, California 94104
 Telephone: 415-986-1400
 4 jennie@andrusanderson.com
 lori@andrusanderson.com

Adam J. Levitt (pro hac vice)
DICELLO LEVITT & CASEY LLC
 Ten North Dearborn Street, Eleventh Floor
 Chicago, Illinois 60602
 Telephone: (312) 214-7900
 alevitt@dlcfirm.com

W. Daniel "Dee" Miles, III (pro hac vice)
BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.
 272 Commerce Street
 Montgomery, Alabama 36104
 Telephone: 334-269-2343
 Dee.Miles@beasleyallen.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

MONTEVILLE SLOAN, JR., RAUL
 SIQUEIROS, TODD AND JILL CRALLEY,
 JOSEPH BRANNAN, LARRY GOODWIN,
 MARC PERKINS, DONALD LUDINGTON,
 THOMAS SHORTER, DERICK BRADFORD,
 GABRIEL DEL VALLE, KEVIN HANNEKEN,
 EDWIN AND KATELYN DOEPEL, DAN
 MADSON, JAMES FAULKNER, JOSEPH
 OLIVIER, SCOTT SMITH, ROSS DAHL,
 DREW PETERSON, MICHAEL WARE,
 STEVE KITCHEN, JOHN NEUBAUER,
 BARBARA MOLINA, DENNIS VITA,
 STEVEN EHRKE, BILL MAUCH, THOMAS
 GULLING, RONALD JONES, MIKE
 WARPINSKI, JOHN GRAZIANO, JOSHUA
 BYRGE, RUDY SANCHEZ, CHRISTOPHER
 THACKER, RANDY CLAUSEN, KELLY
 HARRIS, JAMES ROBERTSON, and JONAS
 BEDNAREK, individually and on behalf of all
 others similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**STIPULATION AND [PROPOSED] ORDER
 RE TIMING OF FILING THIRD AMENDED
 COMPLAINT**

1 **WHEREAS**, in its Order Granting In Part and Denying In Part Defendant’s Motion to Dismiss
2 Second Amended Complaint (the “Order,” Dkt. No. 99), the Court granted Plaintiffs leave to file an
3 amended complaint by March 9, 2018;

4 **WHEREAS**, Plaintiffs intend to file a Third Amended Complaint to address issues raised in the
5 Order;

6 **WHEREAS**, Plaintiffs seek leave to add a new plaintiff to the Third Amended Complaint;

7 **WHEREAS**, Plaintiffs’ counsel requires additional time to confer with certain of Plaintiffs to
8 address certain issues raised in the Order;

9 **IT IS HEREBY STIPULATED**, by and between Plaintiffs and GM, by their undersigned
10 counsel, that, subject to the approval of the Court, Plaintiffs may file their Third Amended Complaint by
11 March 23, 2018, with leave to add one or more new plaintiffs.

12
13 Dated: March 9, 2018

14 /s/ Adam J. Levitt
15 Adam J. Levitt (pro hac vice)

/s/ Joseph J. Ybarra
Joseph J. Ybarra

16 **DICELLO LEVITT & CASEY LLC**
17 Ten North Dearborn Street, Eleventh Floor
18 Chicago, Illinois 60602
19 Telephone: 312-214-7900
20 alevitt@dlcfirm.com

HUANG YBARRA GELBERG & MAY
550 South Hope Street, Suite 1850
Los Angeles, California 90071
Telephone: 213-884-4902
joseph.ybarra@hygmlaw.com

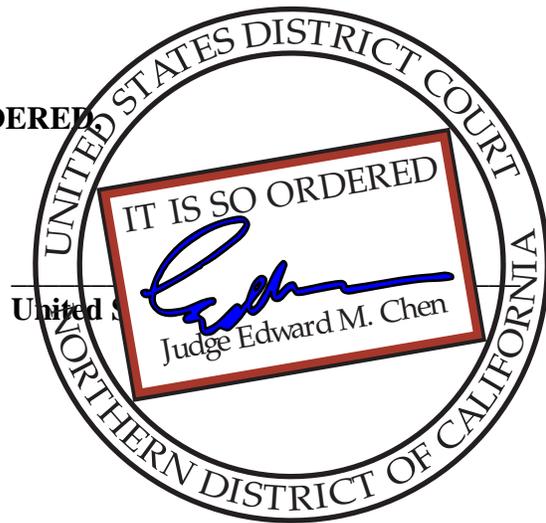
21 **Counsel for Plaintiffs and the Proposed**
22 **Classes**

ISSACS CLOUSE CROSE & OXFORD LLP
21515 Hawthorne Boulevard, Suite 950
Torrance, California 90503
Telephone: (310) 316-1990
goxford@icclawfirm.com

Counsel for General Motors LLC

1 **PURSUANT TO STIPULATION IT IS SO ORDERED**

2
3 **Dated: March 9, 2018**



4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **ECF CERTIFICATION**

2 Pursuant to Civil L.R. 5-1(i)(3), the filing attorney attests that he has obtained concurrence
3 regarding the filing of this document from the signatories to the document.
4

5 Date: March 9, 2018

6 By: /s/ Jennie Anderson
7 Jennie Anderson
8 Andrus Anderson LLP
9 155 Montgomery Street, Suite 900
10 San Francisco, California 94104
11 Tel: 415-986-1400
12 Email: jennie@andrusanderson.com
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28