

1 Crystal Foley (SBN 224627)
 SIMMONS HANLY CONROY LLC
 2 100 N. Sepulveda Boulevard, Suite 1350
 Los Angeles, California 90245
 3 Telephone: 310.322.3555
 Facsimile: 310.322.3655
 4 cfoley@simmonsfirm.com

5 Paul J. Hanly, Jr. (admitted *pro hac vice*)
 Mitchell M. Breit (admitted *pro hac vice*)
 6 SIMMONS HANLY CONROY LLC
 112 Madison Avenue
 7 New York, New York 10016
 Telephone: 315.220.0134
 8 Facsimile: 212.213.5949
 9 phanly@simmonsfirm.com
mbreit@simmonsfirm.com

10 Attorneys for Plaintiffs
 SHERIDA JOHNSON, HARRY GUNSENHOUER,
 11 and SUBRINA SEENARAIN

12 Amir M. Nassihi (SBN 235936)
 Andrew L. Chang (SBN 222309)
 13 SHOOK, HARDY & BACON L.L.P.
 One Montgomery, Suite 2700
 14 San Francisco, California 94104
 Telephone: 415.544.1900
 15 Facsimile: 415.391.0281
 16 anassihi@shb.com
achang@shb.com

17 Attorneys for Defendant
 NISSAN NORTH AMERICA, INC.
 18

19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO DIVISION

22 SHERIDA JOHNSON, HARRY
 GUNSENHOUER, and SUBRINA
 23 SEENARAIN on behalf of themselves and all
 others similarly situated,
 24
 Plaintiffs,
 25
 v.
 26
 NISSAN NORTH AMERICA, INC. and
 27 NISSAN MOTOR CO. LTD.,
 28
 Defendants.

Case No. 3:17-cv-00517-WHO

**STIPULATION AND ORDER TO EXTEND
 TIME TO RESPOND TO PLAINTIFFS'
 FIRST AMENDED COMPLAINT,
 CONTINUE CASE MANAGEMENT
 CONFERENCE, AND EXCEED PAGE
 LIMITATIONS**

1 Pursuant to paragraph 1(d) of the Honorable William H. Orrick’s Case Management
2 Conference Order (Dkt. 20) and L.R. 6-1(b), 6-2, and 7-12, Plaintiffs Sherida Johnson, Harry
3 Gunsenhouer, and Subrina Seenarain (“Plaintiffs”) and Defendant Nissan North America (“NNA”)
4 (collectively, the “Parties”) enter into this stipulation with reference to the following facts and
5 recitals:

6 WHEREAS, Plaintiff Sherida Johnson filed the original complaint in this action on February
7 1, 2017 (Dkt. 1);

8 WHEREAS, by Order dated February 21, 2017, the Court set a Case Management
9 conference on May 9, 2017 at 2:00 p.m. (Dkt. 20);

10 WHEREAS, Plaintiffs’ First Amended Complaint was filed on March 20, 2016, which added
11 claims on behalf of new Plaintiffs Harry Gunsenhouer and Subrina Seenarain (Dkt. 32);

12 WHEREAS, NNA has agreed to accept service of the First Amended Complaint as of April
13 11, 2017, making NNA’s response to the complaint due on May 2, 2017;

14 WHEREAS, the Parties are meeting and conferring regarding the dismissal and/or service of
15 as-yet unserved Defendant Nissan Motor Co. Ltd. subject to terms and conditions that are being
16 discussed between the parties;

17 WHEREAS, the Parties seek to establish a briefing schedule for NNA’s anticipated Motion
18 to Dismiss and coordinate the hearing date for that motion with the initial case management
19 conference in this action to permit the Parties to complete their discussion regarding Defendant
20 Nissan Motor Co. Ltd. and in the interests of efficiency and convenience of the Court and Parties;
21 and

22 WHEREAS, the Parties seek leave of the Court to exceed the page limitations on briefing
23 relating to the Motion to Dismiss based on the complexity and number of additional issues,
24 plaintiffs, states’ laws, and claims that must be addressed therein;

25 Plaintiffs and NNA stipulate and agree as follows and request the Court enter an Order as
26 follows:

1 Dated: April 11, 2017

SIMMONS HANLY CONROY LLC

2 By: /s/ Mitchell M. Breit
3 PAUL J. HANLY, JR.
4 MITCHELL M. BREIT
5 CRYSTAL FOLEY

6 Attorneys for Plaintiffs
7 Sherida Johnson, Harry Gunsenhouse, and
8 Subrina Seenarain

9 Pursuant to L.R. 5-1(i), I attest that concurrence in the filing of this document has been obtained
10 from the other signatories.

11 By: /s/ Amir M. Nassihi
12 Amir M. Nassihi

1
2
3
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

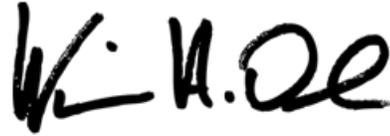
ORDER

Pursuant to the parties' stipulation, the Court hereby orders as follows:

1. NNA's Motion to Dismiss Plaintiffs' First Amended Complaint is due on May 2, 2017;
2. Plaintiffs' Opposition to NNA's Motion to Dismiss is due on June 6, 2017;
3. NNA's Reply in Support of its Motion to Dismiss is due on June 23, 2017;
4. The following page limits apply to the Parties' briefing on NNA's motion to dismiss:
 - a. 35 pages for NNA's motion to dismiss;
 - b. 35 pages for Plaintiffs' opposition; and
 - c. 20 pages for NNA's reply papers.
5. The Initial Case Management Conference is continued from May 9, 2017 to July 12, 2017 at 2:00 p.m. NNA's Motion to Dismiss will also be heard on this date.

IT IS SO ORDERED.

Dated: April 14, 2017


UNITED STATES DISTRICT JUDGE
HONORABLE WILLIAM H. ORRICK