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13
 14 UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16 CHARLES BURGESS, individually and on
 17 behalf of all other similarly situated,

18 Plaintiff,

19 v.

20 AMERICAN HONDA MOTOR COMPANY,
 21 INC.,

22 Defendant.

NO. 3:17-cv-01060-JST

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING DEADLINES
 PENDING CONSOLIDATION [N.D. Cal.
 L.R. 6-2]**

CLASS ACTION

DEMAND FOR JURY TRIAL

The Honorable Jon S. Tigar

I. STIPULATION

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1. On March 7, 2017, this Court issued a Related Case Order (Dkt. # 8) relating this case to *Aberin et al. v. American Honda Motor Company, Inc.*, No. 3:16-cv-04384-JST. That order instructed the parties to adjust the dates for the conference, disclosures and report required by FRCP 16 and 26 accordingly.

2. On March 17, 2017, the Court entered an order based upon the parties' stipulation that extended the date for Defendant American Honda Motor Co., Inc. ("AHM") to answer, move, or otherwise respond to the complaint to 45 days after the court entered an order on AHM's motion to dismiss in the related *Aberin* case.

3. On April 25, 2017, this Court granted in part and denied in part AHM's motion to dismiss in *Aberin*. The deadline for AHM to answer, move, or otherwise respond to the complaint is therefore June 9, 2017.

4. The deadline to file a Rule 26(f) report and serve initial disclosures is currently May 25, 2017.

5. Plaintiffs in this case and *Aberin* intend to file a motion to consolidate the two cases. Plaintiffs are working with the plaintiffs in *Aberin* to file an amended complaint and coordinate discovery efforts.

6. The parties agree that extending the deadlines for the Rule 26(f) report and initial disclosures, as well as the deadline for AHM to answer, move, or otherwise respond to the complaint, will give counsel in this case and *Aberin* the opportunity to file a motion to consolidate and avoid unnecessary inefficiency.

7. The parties therefore request that the Court continue the deadlines to file a Rule 26(f) report and complete initial disclosures, as well as the deadline for AHM to answer, move, or otherwise respond to the complaint, by 90 days.

1 STIPULATED TO, RESPECTFULLY SUBMITTED, AND DATED this 25th day of
2 May, 2017.

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Motor Co. Inc.*

1 **II. LOCAL RULE 5-1(I)(3) STATEMENT**

2 Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this
3 document has been obtained from counsel for all parties, and that I will maintain records to
4 support this concurrence by all counsel subject to this stipulation as required under the local
5 rules.

6 DATED this 25th day of May, 2017.

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III. ~~PROPOSED~~ ORDER

Pursuant to the above Stipulation, IT IS SO ORDERED.

DATED this 25 day of May, 2017.


UNITED STATES DISTRICT JUDGE