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9 Attorneys for Defendant  
 FORD MOTOR COMPANY

10  
 11 **UNITED STATES DISTRICT COURT**  
 12 **NORTHERN DISTRICT OF CALIFORNIA**  
 13 **SAN FRANCISCO DIVISION**

14 DAVID BARANCO, JAMES ABBITT,  
 HARRIET ABRUSCATO, DONALD  
 15 BROWN, DANIEL CARON, ANITA  
 FARRELL, JOHN FURNO, JAMES  
 16 JENKIN, ROGER KINNUNEN, GARY  
 KUBBER and MALISA NICOLAU,  
 17 individually and on behalf of all others  
 similarly situated,

18 Plaintiffs,

19 vs.

20 FORD MOTOR COMPANY, a  
 Delaware corporation;

21 Defendants.

Case No. 3:17-CV-03580-EMC

Assigned to Hon. Edward M. Chen,  
 Courtroom 5 – San Francisco

**JOINT STIPULATION AND  
 [PROPOSED] ORDER TO  
 CONTINUE THE CASE  
 MANAGEMENT CONFERENCE  
 AND EXTEND DEFENDANT’S TIME  
 TO RESPOND TO PLAINTIFFS’  
 AMENDED COMPLAINT**

Complaint Filed: June 21, 2017  
 1<sup>st</sup> Amend Complaint: August 18, 2017  
 Trial Date: None

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 24 Plaintiffs and Defendant FORD MOTOR COMPANY (“Ford”) (collectively  
 25 the “Parties”), by and through their respective counsel, hereby stipulate as follows:

26 **WHEREAS**, Plaintiff David Baranco filed a putative class action complaint in  
 27 the Northern District of California, San Francisco Division, on June 21, 2017 (the

1 “Original Complaint”);

2 **WHEREAS**, upon stipulation of the parties, Ford’s time to respond to the  
3 Original Complaint was extended to August 25, 2017;

4 **WHEREAS**, on July 10, 2017, the Court entered a Case Management Order  
5 setting a case management conference for September 21, 2017;

6 **WHEREAS**, on August 18, 2017, before any response to the Original  
7 Complaint was filed, Plaintiffs filed a First Amended Class Action Complaint  
8 (“Amended Complaint”), which added ten additional plaintiffs from 7 additional  
9 states;

10 **WHEREAS**, Ford’s response to the Amended Complaint is currently due on  
11 September 1, 2017;

12 **WHEREAS**, due to a trial in another matter for Ford’s counsel and the  
13 additional number of Plaintiffs and claims asserted in the Amended Complaint, Ford  
14 has requested and Plaintiffs have agreed to extend Ford’s time to respond to the  
15 Amended Complaint until October 16, 2017;

16 **WHEREAS**, the parties agree that adjourning the case management  
17 conference to a date after Ford responds to the Amended Complaint is appropriate to  
18 preserve judicial economy and the parties resources and to make the conference more  
19 efficient and useful; and

20 **WHEREAS**, counsel for Defendant, as the filer of this document, attests that  
21 concurrence in the filing of the document has been obtained from each of the other  
22 signatories.

23 **IT IS THEREFORE STIPULATED BETWEEN THE PARTIES THAT:**

24 1. The last day for Ford to file a response to Plaintiffs’ Amended  
25 Complaint in the above-entitled action shall be October 16, 2017; and  
26  
27

1           2.     The Case Management Conference set for September 21, 2017 shall be  
2 adjourned and reset to a new date after October 16, 2017, which shall be determined  
3 by the Court pursuant to its schedule.

4 Dated: August 30, 2017

DYKEMA GOSSETT LLC

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By: /s/ Tamara A. Bush  
John M. Thomas  
Tamara A. Bush  
Attorneys for Defendant  
FORD MOTOR COMPANY

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Dated: August 30, 2017

BLOOD HURST & O'REARDON LLP

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By: /s/ Timothy G. Blood  
Timothy G. Blood  
Leslie E. Hurst  
Attorneys for Plaintiff s

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1 **[PROPOSED] ORDER**

2 Having reviewed the Parties' Joint Stipulation and [Proposed] Order  
3 Concerning Time to File Response to Amended Complaint and Adjourning the Case  
4 Management Conference, and for good cause appearing, **IT IS HEREBY**  
5 **ORDERED THAT:**

6 1. Defendant Ford Motor Company's response to Plaintiffs' Amended  
7 Complaint in the above-entitled action shall be continued from September 1, 2017 to  
8 October 16, 2017; and

9 2. The Case Management Conference set for September 21, 2017 is  
10 adjourned and reset to November 21, 2017 <sup>10:00 a.m.</sup> at ~~9:30~~ a.m. in Courtroom 5.

11  
12 **IT IS SO ORDERED.**

13 DATED: 8/31/17

