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14 Attorneys for Defendant
 15 FORD MOTOR COMPANY

16 **UNITED STATES DISTRICT COURT**
 17 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

18 DAVID BARANCO, JAMES ABBITT,
 19 HARRIET ABRUSCATO, DONALD
 BROWN, DANIEL CARON, ANITA
 20 FARRELL, JOHN FURNO, JAMES
 JENKIN, GARY KUBBER and
 21 MALISA NICOLAU, APRIL NICOLO,
 individually and on behalf of all others
 22 similarly situated,

23 Plaintiffs,

24 vs.

25 FORD MOTOR COMPANY, a
 Delaware corporation;

26 Defendants.
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 28

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

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

CLASS ACTION

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING TIME TO
 RESPOND TO PLAINTIFFS’
 SECOND AMENDED CLASS
 ACTION COMPLAINT [L.R. 6-1(A)]**

Complaint Filed: June 21, 2017
 1st Amend Complaint: August 18, 2017
 2nd Amend Complaint: April 11, 2018
 Trial Date: None

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

3 **WHEREAS**, on April 11, 2018, Plaintiffs’ filed a Second Amended Class
4 Action Complaint;

5 **WHEREAS**, pursuant to Fed. R. Civ. P. 15(a)(3), Ford’s responsive pleading
6 is due on April 25, 2018;

7 **WHEREAS**, the parties agree that Ford may file its response to Plaintiffs’
8 Second Amended Complaint by May 9, 2018;

9 **WHEREAS**, the parties agree that if Ford files a partial motion to dismiss it
10 need not file an answer until after the Court enters an order granting or denying such
11 motion.

12 **WHEREAS**, counsel for Defendant, as the filer of this document, attests that
13 concurrence in the filing of the document has been obtained from each of the other
14 signatories:

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

- 16 1. Ford’s response to Plaintiffs’ Second Amended Complaint is due by
17 May 9, 2018.

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1 2. If Ford responds by filing a partial motion to dismiss, it need not file an
2 Answer to Plaintiffs' Second Amended Complaint until after the Court
3 decides Ford's motion.

4 Dated: April 25, 2018

DYKEMA GOSSETT LLC

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6 By: /s/ Tamara A. Bush
7 David M. George (admitted *pro hac vice*)
8 John M. Thomas
9 Tamara A. Bush
10 Attorneys for Defendant
11 FORD MOTOR COMPANY

12 Dated: April 25, 2018

MCCUNE WRIGHT AREVALO LLP

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14 By: /s/ Matthew D. Schelkopf
15 Matthew D. Schelkopf
16 Attorney for Plaintiffs
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[PROPOSED] ORDER

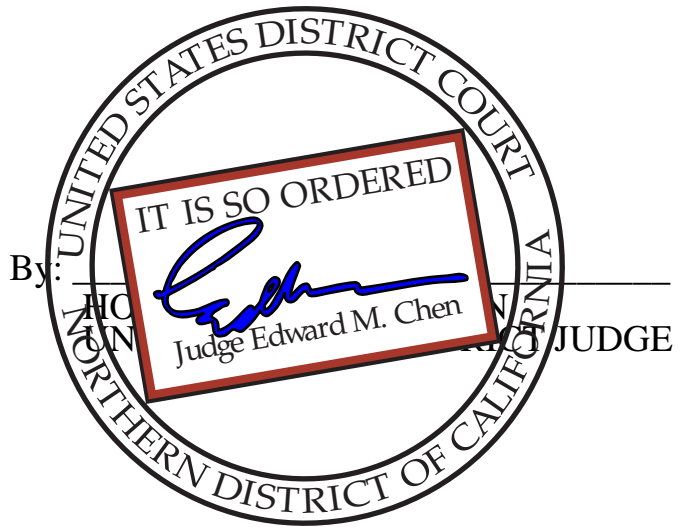
PURSUANT TO STIPULATION OF THE PARTIES, the Stipulation is GRANTED. The Court Orders that:

1. Ford’s response to Plaintiffs’ Second Amended Complaint is due by May 9, 2018.

2. If Ford responds by filing a partial motion to dismiss, it need not file an Answer to Plaintiffs’ Second Amended Complaint until after the Court decides Ford’s motion.

IT IS SO ORDERED.

DATED: 4/25/18



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