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5 Attorneys for Defendant BMW FINANCIAL SERVICES, LLC

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO

11 DEREK FRIEDRICHS, individually and on
 behalf of all others similarly situated,

CASE NO. C 08-04486 PJH

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Plaintiff,

**STIPULATION TO EXTEND
 DEADLINES AND CONFERENCE
 DATES; [PROPOSED] ORDER**

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v.

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15 BMW FINANCIAL SERVICES LLC, a limited
 liability company, and DOES 1-25, inclusive,

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Defendants.

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IT IS HEREBY STIPULATED AND AGREED by the between the plaintiff,

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DEREK FRIEDRICHS, by and through his attorney of record, and defendant BMW FINANCIAL

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SERVICES LLC, by and through its attorneys of record, as follows:

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WHEREAS, plaintiff and defendant are in the midst of settlement discussions and
 23 believe that those discussions will prove fruitful;

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WHEREAS, the Court has scheduled a Case Management Conference to be held in
 25 this case on January 8, 2009, at 2:30 p.m., in Courtroom 3 of the above-captioned court;

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WHEREAS, the parties desire to extend all statutory and court deadlines and

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hearings in this matter by 30 days so that they may focus their efforts on settlement negotiations;

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and

1 WHEREAS, no prejudice shall result from a continuance of the deadlines and Case
2 Management Conference dates.

3 The parties hereby respectfully request that the Court reschedule the January 8, 2009,
4 Case Management Conference for February ⁵~~9~~, 2009, and continue all statutory and court deadlines
5 for a period of 30 days.


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7 DATED: December 15, 2008

JEFFER, MANGELS, BUTLER & MARMARO LLP

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9 By: _____/s/_____
10 MICHAEL J. HASSEN
11 Attorneys for Defendant BMW FINANCIAL
 SERVICES, LLC

12 DATED: December 15, 2008

CHAVEZ & GERTLER LLP

13 
14 By: _____
15 MARK A. CHAVEZ
16 Attorneys for Plaintiff DEREK FRIEDRICHS

17 Dated: December 15, 2008

18 I certify that Michael J. Hassen has authorized me to sign this Stipulation on his behalf.

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21 Mark A. Chavez

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ORDER

Based on the Stipulation of the parties, and good cause appearing:

IT IS HEREBY ORDERED that all statutory and court deadlines in this matter are continued for 30 days; and

IT IS HEREBY FURTHER ORDERED that the case management conference set for January 8, 2009, is rescheduled for February 5, 2009 at 2:30 p.m.

DATED: 12/17/08

