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6 Attorneys for Defendant  
 HUSQVARNA CONSTRUCTION PRODUCTS NORTH AMERICA, INC.

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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 OAKLAND DIVISION

11 GARY FERRAS, an individual,

12 Plaintiff,

13 vs.

14 HUSQVARNA CONSTRUCTION  
 PRODUCTS NORTH AMERICA, INC.,  
 15 HUSQVARNA NORTH AMERICA,  
 HUSQVARNA GROUP, and  
 16 DOES 1 through 100, inclusive,

17 Defendants.

Case No.: 4:16-CV-01081-SBA

[Removed from Contra Costa County Superior  
 Court, Civil Case No.C16-00131]

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER TO CHANGE DEADLINE TO  
 FILE JOINT CASE MANAGEMENT  
 CONFERENCE STATEMENT**

**[Local Rule 6-2]**

Date: June 1, 2016  
 Time: 2:30 p.m.

Complaint Filed: January 25, 2016  
 Removal Date: March 4, 2016  
 Trial Date: None

**STIPULATION**

21 Pursuant to Local Rule 6-2, the parties hereby submit this Stipulation and [Proposed]  
 22 Order to change the deadline in which to file the Joint Case Management Statement of Plaintiff  
 23 Gary Ferras (“Plaintiff”) and Defendant Husqvarna Construction Products North America, Inc.  
 24 (“Defendant”). The initial case management conference in this action is currently scheduled for  
 25 June 1, 2016, at 2:30 p.m., and the deadline for the parties to file a joint case management  
 26 statement is May 25, 2016.  
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Case No.: 4:16-CV-01081-SBA

1 WHEREAS, the parties have been meeting and conferring to finalize a written joint case  
2 management statement to submit to the Court.

3 WHEREAS, on May 25, 2016, Plaintiff Gary Ferras' counsel, Mr. Alan Cohen, suffered  
4 a medical emergency;

5 WHEREAS, Mr. Cohen has requested and, counsel for Defendant agrees, that to allow  
6 Mr. Cohen to attend to his medical emergency and sufficient time to review the joint case  
7 management statement the parties have been working on, the deadline to file the parties' Joint  
8 Case Management Statement should be extended by two days to May 27, 2016.

9 NOW, THEREFORE, THE PARTIES AGREE AS FOLLOWS:

10 1. The deadline for deadline for Plaintiff and Defendant to file their joint case manage  
11 statement is extended by two days to May 27, 2016.

12 **SO STIPULATED.**

13  
14 DATED: May 25, 2016

Respectfully submitted,  
FISHER & PHILLIPS LLP

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By: /s/ Juan C. Araneda  
Jason A. Geller  
Juan C. Araneda  
Attorneys for Defendant  
HUSQVARNA CONSTRUCTION  
PRODUCTS NORTH AMERICA, INC.

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DATED: May 25, 2016

LAW OFFICES OF ALAN F. COHEN

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By: /s/ Alan F. Cohen  
Alan F. Cohen  
Attorneys for Plaintiff  
GARY FERRAS

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**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

The Court, having read and considered the parties’ Stipulation to Change Deadline To File Joint Case Management Conference Statement, and finding good cause in support thereof, hereby orders that the deadline for the parties to file their joint case management conference statement is extended as by two days to May 27, 2016.

DATED: May 27, 2016

  
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HON. SAUNDRA B. ARMSTRONG  
UNITED STATES DISTRICT JUDGE

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**DECLARATION OF CONSENT**

Pursuant to Local Rule 5-1(i)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the above-listed counsel for Plaintiff Gary Ferras.

DATED: May 25, 2016

/s/Juan C. Araneda  
Juan C. Araneda