

1 MARTIN S. PUTNAM (State Bar No. 160951)  
 2 [martin@putnamlaw.com](mailto:martin@putnamlaw.com)  
 3 1300 Clay Street, Suite 600  
 4 Oakland, CA 94612  
 5 Tel. (510) 466-6300  
 6 Fax (510) 225-2625

7 Attorneys for Defendant and Cross-Complainant  
 8 HANLEES FREMONT, INC.

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

11 WEERACHAI CHAIWONG, an individual,  
 12 Plaintiff,  
 13 vs.  
 14 HANLEES FREMONT, INC., a California  
 15 Corporation, dba HANLEES FREMONT  
 16 HYUNDAI; ALLY FINANCIAL, INC., a  
 17 Delaware Corporation; and DOES 1 through  
 18 75, inclusive,  
 19 Defendants.

Case No. 4:16-cv-04074-HSG

**STIPULATED REQUEST FOR ORDER  
 EXTENDING TIME FOR HANLEES  
 FREMONT, INC. TO RESPOND TO  
 ALLY FINANCIAL’S MOTION TO  
 DISMISS AMENDED CROSS-CLAIM,  
 AND FOR ALLY TO FILE ITS REPLY,  
 PURSUANT TO LOCAL RULE 6-2**

Action Filed: May 25, 2016  
 Alameda Superior

Removed to USDC, ND of California:  
 July 20, 2016

Pursuant to Local Rule 6-2, defendant and cross-complainant Hanlees Fremont, Inc. (“Hanlees”), defendant Ally Financial Inc. (“Ally”), and Plaintiff Weerachai Chaiwong (together, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

**STIPULATION**

WHEREAS, Hanlees filed an answer to plaintiff’s second amended complaint and a first amended cross-claim against Ally on October 27, 2017;

WHEREAS, Hanlees stipulated to a 17-day extension of time for Ally to respond to the amended cross-claim, from November 10, 2017 to November 27, 2017;

WHEREAS, Ally filed a motion to dismiss the amended cross-claim on November 27, 2017;

1           WHEREAS, Hanlees' opposition to Ally's Motion to Dismiss is presently due to be filed  
2 on December 11, 2017;

3           WHEREAS, counsel for Hanlees is engaged in a hearing on the merits of another case now  
4 before the American Arbitration Association, *Gless v. Zoom*, that has been extended to December  
5 11, 2017;

6           WHEREAS, the parties have stipulated to an extension of time for Hanlees to file such  
7 opposition up to and including December 22, 2017;

8           WHEREAS, the extension on the deadline for Hanlees to file its opposition would make  
9 Ally's reply due on December 29, 2017;

10           WHEREAS, Ally's counsel has scheduling conflicts the week of December 25, 2017, and  
11 the parties have stipulated that Ally may have an extension of time to file its reply to and including  
12 January 4, 2018; and

13           WHEREAS, these extensions will not have any effect on the current schedule for the case.

14           IT IS HEREBY STIPULATED, by and between the Parties hereto, through their  
15 respective attorneys of record, to an order granting Hanlees an 11-day extension, up to and  
16 including December 22, 2017, in which to file a response to Ally's Motion to Dismiss the  
17 amended cross-claim. IT IS FURTHER STIPULATED that Ally may have an extension on its  
18 deadline to file its reply to January 4, 2018.

19           This Stipulation requests the first extension of time for Hanlees to respond to Ally's  
20 motion to dismiss the amended cross-claim and for Ally to file its reply in support of the motion to  
21 dismiss, and is made without prejudice to, or waiver of, any rights or defenses otherwise available  
22 to the Parties in this action.

23 //

24 //

25 //

26 //

27 //

1 DATED: December 11, 2017

SEVERSON & WERSON  
A Professional Corporation

2

3

By:           /s/ Erik Kemp            
Erik Kemp

4

5

Attorneys for Defendant  
ALLY FINANCIAL INC.

6

7 DATED: December 11, 2017

LAW OFFICES OF MARTIN PUTNAM

8

9

By:           /s/ Martin Putnam            
Martin Putnam

10

11

Attorney for Defendant and Cross-Complainant  
HANLEES FREMONT, INC.

12

13 DATED: December 11, 2017

LAW OFFICES OF GLASSEY | SMITH

14

15

By:           /s/ Joshua C. Anaya            
Joshua C. Anaya

16

17

Attorneys for Plaintiff  
WEERACHAI CHAIWONG

18

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20

21 DATED:           12/13/2017          

  
UNITED STATES DISTRICT JUDGE

22

23

24

25

26

27

28