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 AUTOBAHN, INC. and SONIC  
 AUTOMOTIVE, INC

18 UNITED STATES DISTRICT COURT

19 FOR THE NORTHERN DISTRICT OF CALIFORNIA

20 STEVE FERRARI, et al.,

21 Plaintiffs,

22 v.

23 AUTOBAHN, INC. DBA AUTOBAHN  
 MOTORS; MERCEDES-BENZ USA, LLC;  
 24 AND SONIC AUTOMOTIVE, INC.

25 Defendants.

) Case No. 4:17-CV-00018-YGR  
 ) ORDER GRANTING  
 ) ~~STIPULATION AND [PROPOSED]~~  
 ) ~~ORDER STAYING PROCEEDINGS TO~~  
 ) PERMIT FURTHER MEDIATION

) AS MODIFIED BY THE COURT

) The Honorable Yvonne Gonzalez Rogers

1 WHEREAS, Plaintiffs in the above-named action have filed suit against Defendants  
2 Autobahn, Inc., Sonic Automotive, Inc. (collectively, “the Autobahn Defendants”), and  
3 Mercedes-Benz USA, LLC (“MBUSA”);

4 WHEREAS, Plaintiffs filed their Third Amended Complaint on February 6, 2018;

5 WHEREAS, Defendants’ deadline to respond to the Third Amended Complaint is  
6 February 27, 2018;

7 WHEREAS, on November 8, 2017, the parties participated in a mediation session with  
8 retired Judge Raul Ramirez of ADR Services, Inc.;

9 WHEREAS, Plaintiffs and the Autobahn Defendants have engaged in further settlement  
10 discussions subsequent to the November mediation session;

11 WHEREAS, Plaintiffs and the Autobahn Defendants believe that negotiations have  
12 progressed to a point where a further mediation session with Judge Ramirez will be productive;

13 WHEREAS, Plaintiffs and the Autobahn Defendants have agreed upon a framework for  
14 further discussions in a second mediation session before Judge Ramirez that would address all  
15 claims against the Autobahn Defendants as well as potentially narrow the scope of the claims  
16 remaining against MBUSA;

17 WHEREAS, Plaintiffs and the Autobahn Defendants have agreed to schedule a further  
18 mediation session with Judge Ramirez in Sacramento on March 9, 2018, which is the first  
19 available date on Judge Ramirez’s calendar;

20 WHEREAS, in light of the above, the parties agree and respectfully request that all non-  
21 settlement related proceedings, including the deadline for Defendants to respond to the Third  
22 Amended Complaint, should be stayed pending the conclusion of the further mediation, to permit  
23 the parties to focus their efforts on seeking to resolve and/or narrow the claims in this action.

24 NOW THEREFORE, ALL PARTIES, BY AND THROUGH THEIR UNDERSIGNED  
25 COUNSEL hereby stipulate and respectfully request that:

- 26 1. All non-settlement proceedings, including the deadline for Defendants to respond  
27 to the Third Amended Complaint, shall be stayed until further Order of the Court.  
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2. The Case Management Conference set for March 26, 2019 shall be taken off calendar.

3. The parties shall submit a status report to the Court on the earlier of: April 9, 2018 or five days after agreeing on resolution of some or all of the claims in the case.

4. Any party wishing to lift the stay of proceedings may file a request with the Court seeking such relief.

**IT IS SO STIPULATED.**

Dated: February 21, 2018

HOGAN LOVELLS US LLP  
By: ~~/s/ Regina M. Rodriguez~~  
REGINA M. RODRIGUEZ  
*Attorneys for Defendants*  
Mercedes-Benz USA, LLC

Dated: February 21, 2018

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STEVE FERRARI  
MICHAEL KEYNEJAD, ET AL.

Dated: February 21, 2018


WILLIAMS & CONNOLLY LLP  
By: ~~/s/ F. Greg Bowman~~  
F. GREG BOWMAN  
*Attorneys for Defendants*  
AUTOBAHN, INC. and SONIC AUTOMOTIVE  
INC.

**ORDER**

Pursuant to stipulation, this action is stayed through April 30, 2018. The March 26, 2018 case management conference is VACATED. A compliance hearing regarding the status of settlement is set for April 27, 2018, on the Court's 9:01 a.m. calendar. The parties shall file a joint statement regarding the status of their negotiations no later than April 20, 2018.

IT IS SO ORDERED.

Date: February 26, 2018

  
YVONNE GONZALEZ ROGERS  
United States District Judge