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14 *Attorneys for Plaintiffs and the Proposed Class*

15 [Additional counsel appear on signature page.]

16 **UNITED STATES DISTRICT COURT**  
 17 **NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

18 RONALD RAYNALDO, RICHARD  
 19 BARRIE, FERNANDA NUNES FERREIRA,  
 GEORGE JONES, ROBERT LIZZUL,  
 20 MITCHELL BRYON PAZANKI, JOHN  
 PROVENZANO, HARRY RAPP, DENNIS  
 21 WOODS, DAYANE TESSINARI,  
 BRENDAN SANGER, AND JASON CASEY,  
 22 Individually and on Behalf  
 of All Others Similarly Situated,

23 Plaintiffs,

24 vs.

25 AMERICAN HONDA MOTOR CO., INC.,

26 Defendant.  
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Mark J. Dearman (*pro hac vice*)  
 Eric S. Dwoskin (*pro hac vice*)  
 Alexander C. Cohen (*pro hac vice*)  
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Case No.: 4:21-cv-05808-HSG

**STIPULATION AND ORDER**  
**CONTINUING DATE TO FILE FIRST**  
**AMENDED CLASS ACTION**  
**COMPLAINT AND SETTING DEADLINE**  
**FOR DEFENDANT TO RESPOND TO**  
**THE FIRST AMENDED CLASS ACTION**  
**COMPLAINT**

Judge: Hon. Haywood S. Gilliam, Jr.  
Ctm: 2 – 4th Floor

1           WHEREAS, on September 20, 2022, the Court entered an Order Granting Motion to Dismiss  
2 (Dkt. No. 70) (the “Dismissal Order”), permitting Plaintiffs in the above-captioned action (the  
3 “Action”) until October 18, 2022 to file a further amended complaint (the “First Amended Class  
4 Action Complaint”);

5           WHEREAS, the parties have been meeting and conferring about some issues that Plaintiffs  
6 believe may impact the amended complaint;

7           WHEREAS, to promote judicial efficiency, and allow the parties time to meet and confer  
8 about these issues to hopefully avoid having to seek Court intervention, Plaintiffs have requested,  
9 and AHM does not oppose, a 30-day extension for Plaintiffs to file their First Amended Class Action  
10 Complaint;

11           WHEREAS, the parties further stipulate and agree that AHM’s deadline to respond to the  
12 First Amended Complaint is 30 days after the First Amended Class Action Complaint is filed.

13           WHEREAS, no discovery cut-off deadline, dispositive motion deadline or trial date has been  
14 set in the Action and therefore this stipulation does not impact existing dates in the Action;

15           WHEREAS, this is the first extension request as to the date set in the Dismissal Order to file  
16 the First Amended Class Action Complaint, and the second time the Parties have requested an  
17 extension in the Action as to the filing of an amended complaint and/or a briefing schedule in that  
18 on September 28, 2021, the Court entered an order (Dkt. No. 14) granting the stipulation of the  
19 Parties as to AHM’s response to the Amended Class Action Complaint (Dkt. No. 15);

20           ACCORDINGLY, it is STIPULATED by the Parties, subject to Court approval, that:

- 21           1. Plaintiffs shall file their First Amended Class Action Complaint by November 17, 2022;
- 22           2. AHM shall have thirty (30) days to file a Motion to Dismiss after Plaintiffs file the First  
23           Amended Class Action Complaint (the “Motion to Dismiss”).

24           IT IS SO STIPULATED.  
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1  
2 DATED: October 10, 2022

**KAPLAN FOX & KILSHEIMER LLP**

3 By: /s/ Kathleen A. Herkenhoff  
Kathleen A. Herkenhoff

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*Attorneys for Plaintiffs and the Proposed Class*

DATED: October 10, 2022

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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Kathleen A. Herkenhoff, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10th day of October 2022, at San Diego, California.

By: /s/ Kathleen A. Herkenhoff  
Kathleen A. Herkenhoff

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**ORDER**

Pursuant to Stipulation, IT IS SO ORDERED.

Dated: 10/11/2022

  
HONORABLE HAYWOOD S. GILLIAM, JR.  
U.S. DISTRICT COURT JUDGE