

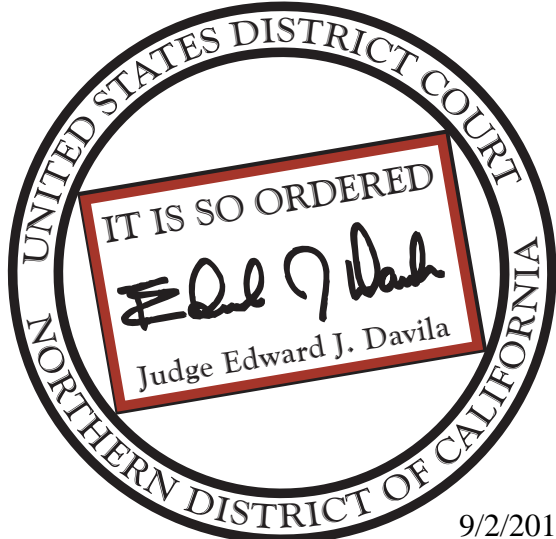
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISON

Case No. C11-02911 EJD

IN RE HAIER FREEZER CONSUMER
LITIGATION

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO FILE
AND RESPOND TO CONSOLIDATED
AMENDED COMPLAINT**

Judge: Honorable Edward J. Davila
Ctrm: 1, 5th Floor

1 Plaintiffs Christopher Collins and Robert A. Douglas (“Plaintiffs”) and defendants Haier
2 America Trading, LLC and General Electric Company (“Defendants”) (collectively the
3 “Parties”), by and through their respective counsel, hereby stipulate and agree to extend the time
4 for Plaintiffs to file their consolidated amended complaint and to extend the time for Defendants
5 to answer or otherwise respond to the consolidated complaint as follows:

6 WHEREAS, on August 17, 2011 the Court granted the parties’ August 10, 2011
7 stipulated request to consolidate *Collins v. Haier America Trading, LLC et al.*, Case No. C11-
8 02911 EJD (filed on June 14, 2011) and (2) *Douglas v. Haier America Trading, LLC et al.*, Case
9 No. C11-02950 EJD (filed on June 15, 2011);

10 WHEREAS, the deadline for Plaintiffs to file a consolidated amended complaint is
11 September, 1, 2011;

12 WHEREAS, the deadline for Defendants to answer or otherwise respond to the
13 consolidated amended complaint is October 21, 2011;

14 WHEREAS, Plaintiffs’ counsel has requested, and Defendants’ counsel has agreed to an
15 extension of time for the filing of the consolidated amended complaint;

16 WHEREAS, the Parties agree that Plaintiffs will file and serve a consolidated amended
17 complaint by September 15, 2011, and that counsel for Defendants agree to accept service of the
18 consolidated amended complaint;

19 WHEREAS, the Parties agree that Defendants will respond to the consolidated amended
20 complaint by November 18, 2011;

21 WHEREAS, extending Plaintiffs’ deadline to file the consolidated amended complaint
22 will have no negative effect on the future scheduling in this case;

- 23
24
25 1. THEREFORE, IT IS HEREBY STIPULATED by and between the undersigned counsel
26 for the parties that Plaintiffs shall file and serve their consolidated amended class action
27 complaint by September 15, 2011.
28

1 2. Defendants shall answer, move or otherwise respond to the consolidated amended class
2 action complaint by November 18, 2011.
3

4 IT IS SO STIPULATED

5 Date: August 30, 2011
6

7 **BURSOR & FISHER, P.A.**

8 /s/

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8 *Attorneys for Defendant General Electric Company*

9 **ATTESTATION OF FILER**

10 Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all
11 parties have concurred in the filing of this stipulation.

12 Dated: August 30, 2011

13 Respectfully submitted,

14 _____
15 /s/

16 Sarah N. Westcot

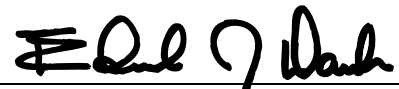
~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED as follows:

1. On or before September 15, 2011, Plaintiffs in *In re Haier Freezer Consumer Litigation* shall file a consolidated amended class action complaint.
2. Defendants shall answer, move or otherwise respond to the consolidated amended class action complaint on or before November 18, 2011.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 2, 2011



JUDGE EDWARD J. DAVILA
United States District Judge