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7 *Attorneys for Defendant Ford Motor Company*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

11 STEPHEN MASSA,

12 Plaintiff

13 vs.

14 FORD MOTOR COMPANY; and DOES 1 to  
15 10,

16 Defendants

Case No.: 3:22-cv-00243-ART-CLB

**Stipulation and Order to Extend Time to  
File Joint Case Management Report**

**(Second Request)**

17 Plaintiff Stephen Massa and defendant Ford Motor Company, through their counsel of  
18 record, for good cause shown, stipulate to extend the parties' deadline to file their joint case  
19 management report to September 1, 2022, for the following reasons:

20 1. On January 12, 2022, Massa filed his complaint against Ford in the Superior Court  
21 of the State of California for the County of San Diego, North County.<sup>1</sup>

22 2. Ford removed the action to the United States District Court for the Southern District  
23 of California on March 11, 2022.<sup>2</sup>

27 <sup>1</sup> ECF No. 1-3 (complaint).

28 <sup>2</sup> ECF No. 1 (notice of removal).

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1           3.       Massa amended his complaint on April 15, 2022,<sup>3</sup> which Ford answered on April  
2 29, 2022.<sup>4</sup>

3           4.       The same day, the parties jointly moved to change venue to the District of Nevada.<sup>5</sup>

4           5.       Judge Anthony J. Battaglia of the Southern District of California granted the transfer  
5 motion and transferred this action to the District of Nevada on May 19, 2022.<sup>6</sup>

6           6.       On June 2, 2022, this Court ordered the parties to file their joint case management  
7 report.<sup>7</sup>

8           7.       On July 7, 2022, this Court granted the parties' stipulation to extend the deadline to  
9 file their joint case management report because the parties had recently retained new counsel in  
10 Nevada.<sup>8</sup> This is thus the second request to extend the deadline to file the joint case management  
11 report.

12          8.       Counsel for Ford emailed Massa's counsel on July 25, 2022, and July 27, 2022, to  
13 schedule the court-ordered meet and confer about the topics in the case-management report.

14          9.       Massa is in the process of locating new Nevada counsel for this matter and thus  
15 require additional time to retain new counsel and review the relevant documents to meaningfully  
16 meet and confer and inform this Court about the items required by this Court's order.

17          10.      The parties agreed to this extension.

18          11.      The extension request is sought in good faith and is not made for the purpose of  
19 delay.

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24 <sup>3</sup> ECF No. 8 (amended complaint).

25 <sup>4</sup> ECF No. 11 (answer).

26 <sup>5</sup> ECF No. 9 (joint motion).

27 <sup>6</sup> ECF No. 13 (order granting joint motion).

27 <sup>7</sup> ECF No. 17 (order to file case management report).

28 <sup>8</sup> ECF No. 22 (order granting stipulation).

1 Therefore, the parties respectfully request an extension to file their joint case management  
2 report in this matter up to and including September 1, 2022.

3  
4 Dated: August 1, 2022

Dated: August 1, 2022

5  
6 CLINE APC

SNELL & WILMER L.L.P.

7 By: /s/ Brian Kelly Cline

By: /s/ Christian Ogata

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*Attorneys for Plaintiff*

*Attorneys for Ford Motor Company*

**ORDER**

13 Good cause appearing, **IT IS HEREBY ORDERED** that the parties shall file their joint  
14 case management report on or before September 1, 2022.

**IT IS SO ORDERED.**

15  
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17 \_\_\_\_\_  
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: August 2, 2022  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2022 I electronically transmitted the foregoing document to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

/s/ Lyndsey Luxford  
An employee of SNELL & WILMER L.L.P.

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