

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TAMARA LOHR and RAVIKIRAN  
SINDOGI, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

NISSAN NORTH AMERICA, INC., and  
NISSAN MOTOR CO., LTD.,

Defendants.

Case No. 2:16-cv-01023-RSM

**STIPULATION AND ORDER  
REGARDING DEADLINE TO FILE  
PLAINTIFFS’ OPPOSITION  
DEFENDANT’S MOTION FOR  
SUMMARY JUDGMENT**

Plaintiffs Tamara Lohr and Ravikiran Sindogi (“Plaintiffs”) and Defendant Nissan North America, Inc. (“NNA”) (collectively, the “Parties”) enter into this stipulation with reference to the following facts and recitals:

1. On December 7, 2021, Defendants filed a motion for Summary Judgment. ECF No. 193.
2. The Parties met and conferred on December 9, 2021, agreeing that, in order to accommodate scheduling over the Christmas and New Year’s holidays, Plaintiffs’ deadline to file their opposition to Defendant’s motion for summary judgment shall be extended to January 31, 2022. Defendant’s reply briefs shall now be due on March 2, 2022.

IT IS SO STIPULATED.

1 /s/ Mark E. Silvey

2 On Behalf of Plaintiffs

3 Gregory F. Coleman, Admitted *PHV*  
4 Mark E. Silvey, Admitted *PHV*  
5 MILBERG COLEMAN BRYSON PHILLIPS  
6 GROSSMAN, PLLC  
7 First Horizon Plaza  
8 800 South Gay Street, Suite 1100  
9 Knoxville, Tennessee 37929  
10 Telephone: (865) 247-0080  
11 Facsimile: (865) 533-0049  
12 gcoleman@milberg.com  
13 msilvey@milberg.com

14 Benjamin M. Drachler (WSBA #51021)  
15 Beth E. Terrell, WSBA #26759  
16 Amanda M. Steiner, WSBA #29147  
17 TERRELL MARSHALL LAW GROUP PLLC  
18 936 North 34th Street, Suite 300  
19 Seattle, Washington 98103-8869  
20 Telephone: (206) 816-6603  
21 bdrachler@terrellmarshall.com  
22 bterrell@terrellmarshall.com  
23 asteiner@terrellmarshall.com

24 Charles Crueger, Admitted *PHV*  
25 Erin Dickinson, Admitted *PHV*  
26 CRUEGER DICKINSON LLC  
27 4532 North Oakland Avenue  
28 Whitefish Bay, Wisconsin 53211  
Telephone: (414) 210-3868  
cjc@cruegerdickinson.com  
ekd@cruegerdickinson.com

Edward A. Wallace, Admitted *PHV*  
WEXLER WALLACE LLP  
55 West Monroe Street, Suite 3300  
Chicago, Illinois 60603  
Telephone: (312) 346-2222  
Facsimile: (312) 346-0022  
eaw@wexlerwallace.com

/s/ Amir M. Nassihi

On Behalf of Defendant  
Nissan North America, Inc.

David Bartley Eppenauer WSBA #29807  
SHOOK, HARDY & BACON L.L.P.  
Columbia Center  
701 Fifth Ave., Suite 6800  
Seattle, WA 98104  
Telephone: (206) 344-7600  
Facsimile: (206) 344-3113  
beppenauer@shb.com

Amir M. Hassihi, Admitted *PHV*  
Andrew L. Chang, Admitted *PHV*  
H. Grant Law, Admitted *PHV*  
SHOOK, HARDY & BACON L.L.P.  
Mission Street, Suite 2300  
San Francisco, CA 94105  
Telephone: (415) 544-1900  
Facsimile: (415) 391-0281  
anassihi@shb.com  
achang@shb.com  
hlaw@shb.com

William R. Sampson, Admitted *PHV*  
Holly Pauling Smith, Admitted *PHV*  
SHOOK, HARDY & BACON L.L.P.  
2555 Grand Boulevard  
Kansas City, MI 64108  
Telephone: (816) 474-6550  
Facsimile: (816) 421-5547  
wsampson@shb.com  
kpsmith@shb.com

MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN, PLLC  
800 S. Gay Street, Suite 1100  
Knoxville, TN 37929  
TEL. 865.247.0080/FAX 865.522.0049  
www.milberg.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

PURSUANT TO STIPUATION, IT IS SO ORDERED. Defendant's Motion for Summary Judgment, Dkt. #193, is re-noted for consideration on March 2, 2022.

DATED this 4<sup>th</sup> day of January, 2022.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE