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11 Attorneys for Defendant
12 FORD MOTOR COMPANY

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

17 In re:
18 MYFORD TOUCH CONSUMER
19 LITIGATION

Case No. 3:13-CV-3072-EMC

**STIPULATION AND [~~PROPOSED~~] ORDER
REGARDING MODIFICATION TO
DEADLINE TO FILE RESPONSIVE
DECLARATION REGARDING MOTION
TO SEAL CLASS CERTIFICATION BRIEF**

[N.D. CAL. L.R. 7-11]

Judge: Hon. Edward M. Chen

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1 WHEREAS, Plaintiffs will file their motion for class certification and memorandum of
2 law in support thereof on Thursday, January 28, 2016;

3 WHEREAS, this Court, pursuant to stipulation, extended the page limit for that
4 memorandum of law to fifty pages (*see* ECF No. 192);

5 WHEREAS, Plaintiffs have stated their intent to cite numerous documents in their class
6 certification papers that have been designated by Ford as Protected Documents pursuant to the
7 protective order entered in this case (ECF No. 96), or will make assertions that are derived from
8 such Protective Documents;

9 WHEREAS, pursuant to the Protective Order and Local Rule 79-5, Plaintiffs shall file
10 their papers as partially redacted so as not to disclose the contents of the Protected Documents,
11 and will file a motion to seal the redacted information;

12 WHEREAS, Ford is required to file a responsive declaration supporting the sealing of the
13 Protected Documents or information derived therefrom in Plaintiffs' papers within four days after
14 they are filed (*see* ECF No. 96 at 6);

15 WHEREAS, two of the four days provided for Ford to file the responsive declaration
16 supporting the sealing of the Protected Documents coincide with a weekend;

17 WHEREAS, Local Rule 7-11 permits a party to seek miscellaneous administrative relief
18 pursuant to a stipulation by the parties;

19 WHEREAS, the deadline extension stipulated to by Ford and Plaintiffs will require no
20 change to the dates set for trial of the matter;

21 WHEREAS, execution of this Stipulation is not a waiver of any claims or defenses
22 Plaintiffs or Ford otherwise may have;

23 THEREFORE, IT IS HEREBY STIPULATED by Plaintiffs and Ford, through their
24 counsel of record, subject to the approval of the Court, as follows:

- 25 1. The deadline for Ford to file a responsive declaration to establish that certain
26 material in Plaintiffs' class certification papers is sealable is extended to
27 February 5, 2016.
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Dated: January 26, 2016

O'MELVENY & MYERS LLP

By: /s/ Randall W. Edwards
Randall W. Edwards

Attorneys for Defendant Ford Motor Company

1 Dated: January 26, 2016

**HAGENS BERMAN SOBOL SHAPIRO
LLP**

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FILER'S ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that the other signatory listed, on whose behalf the filing is submitted, concurs in the filing's content and has authorized the filing.

Dated: January 26, 2016

Randall W. Edwards
O'MELVENY & MYERS LLP

By: /s/ Randall W. Edwards
Randall W. Edwards
Attorney for Defendant Ford Motor Company

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 2/3, 2016

