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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 FURTHER 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 filed their fifty page motion for class certification and
2 memorandum of law in support thereof on Thursday, January 28, 2016;

3 WHEREAS, Plaintiffs cited numerous documents in their class certification papers that
4 have been designated by Ford as Protected Documents pursuant to the protective order entered in
5 this case (ECF No. 96), and made numerous assertions that are derived from such Protective
6 Documents;

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

10 WHEREAS, pursuant to stipulation entered by this Court, Ford is required to file a
11 responsive declaration supporting the sealing of the Protected Documents or information derived
12 therefrom in Plaintiffs' papers by February 5, 2016 (*see* ECF No. 207);

13 WHEREAS, Plaintiffs had not yet filed their class certification papers at the time the prior
14 stipulation was filed;

15 WHEREAS, Ford has been diligently working on drafting its responsive declaration, but
16 the breadth of the Protected Documents Plaintiffs cited in their papers has proven to make it
17 impractical to finish the declaration by February 5, despite best efforts;

18 WHEREAS, Ford requires an extension of two business days in order to complete its
19 responsive declaration;

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

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

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

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

- 28 1. The deadline for Ford to file a responsive declaration to establish that certain

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material in Plaintiffs' class certification papers is sealable is further extended to
February 9, 2016.

Dated: February 4, 2016

O'MELVENY & MYERS LLP

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

Attorneys for Defendant Ford Motor Company

1 Dated: February 4, 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: February 4, 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: February 8, 2016

