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13 FORD MOTOR COMPANY

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 In re:
19 MYFORD TOUCH CONSUMER
20 LITIGATION

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

**STIPULATION AND [PROPOSED] ORDER
REGARDING MODIFICATION TO
DEADLINE TO FILE RESPONSIVE
DECLARATION REGARDING MOTION
TO SEAL REPLY IN SUPPORT OF CLASS
CERTIFICATION BRIEF**

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

Judge: Hon. Edward M. Chen

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1 WHEREAS, Plaintiffs filed their thirty-five page reply in support of their motion for class
2 certification on Monday, May 2, 2016, along with exhibits;

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

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

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

12 WHEREAS, the number of the Protected Documents Plaintiffs cited in their papers, and
13 the fact that the individual responsible for signing the declaration will be out of the office and
14 unavailable on Thursday, May 5 and Friday, May 6 make it impractical to finish the declaration
15 by Friday, May 6, despite best efforts;

16 WHEREAS, Ford requires an extension of three business days in order to complete its
17 responsive declaration;

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

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

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

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

- 26 1. The deadline for Ford to file a responsive declaration to establish that certain
27 material in Plaintiffs' class certification reply papers is sealable is extended to
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Wednesday, May 11, 2016.

Dated: May 4, 2016

O'MELVENY & MYERS LLP

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

Attorneys for Defendant Ford Motor Company

Dated: May 4, 2016

**HAGENS BERMAN SOBOL SHAPIRO
LLP**

By: /s/ Craig Spiegel
Craig Spiegel

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Plaintiffs' Interim Co-Lead Counsel

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: May 4, 2016

O'MELVENY & MYERS LLP

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

Attorney for Defendant Ford Motor Company

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 9, 2016

