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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
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14 RYAN HINDSMAN, JAMES ANDREWS,
15 ROBIN PETERSON, DAINA MIRANDA, and
16 VANESSA MARYANSKI on behalf of
themselves and all others similarly situated,
Plaintiffs,

17 v.

18 GENERAL MOTORS LLC, a Delaware limited
19 liability company,

20 Defendant.

Case No. 3:17-cv-5337-JSC

**JOINT STIPULATION TO STAY THE
CASE**

21 **WHEREAS**, the Court previously issued an order staying this action until December 5,
22 2018 and rescheduling the Case Management Conference for December 13, 2018, pending
23 completion of a mediation and related settlement negotiations (Dkt. No. 63).

24 **WHEREAS**, this case is one of three related nationwide class actions pending, the others
25 being *Sanchez v. General Motors LLC*, United States District Court for the Northern District of
26 Illinois, No. 18-cv-02536 (“Illinois Action”) and *Berman v. General Motors LLC*, United States
27 District Court for the Southern District of Florida, NO. 2:18-CV-1437 (“Florida Action”).
28

1 **WHEREAS**, after completing a second mediation session with Hon. Jay Gandhi (Ret.) at
2 the JAMS Resolution Center in Los Angeles on November 7, 2018, the parties reached agreement
3 on all substantive terms of a nationwide class settlement in the Florida Action that will encompass
4 all of the claims, parties and proposed class members in this Action and the Illinois Action;

5 **WHEREAS**, the parties are in preparing settlement documentation that they anticipate
6 presenting for preliminary approval by the Court in the Florida Action within 60 to 90 days;

7 **WHEREAS**, if the Court in the Florida Action grants preliminary approval, the parties
8 anticipate that this Action and the Illinois Action will be dismissed without prejudice;

9 **WHEREAS**, the parties jointly request a 90-day stay extension of the current stay in this
10 action permit completion and submission of the settlement documentation in the Florida action;

11 **IT IS HEREBY STIPULATED**, by and between Plaintiffs and Defendant, by and
12 through their undersigned counsel of record, subject to the Court’s approval, that the Court may
13 enter its order as follows:

- 14 1. The case is stayed until March 5, 2019, pending further order of the Court;
- 15 2. The Case Management Conference currently scheduled for December 13, 2018 is
16 removed from the Court’s calendar subject to rescheduling by the Court on March 14, 2019 or
17 any subsequent date convenient to the Court.

18 Dated: December 5, 2018

19 /s/ Theodore Maya

/s/ Gregory R. Oxford

20 AHDOOT & WOLFSON PC

ISAACS CLOUSE CROSE & OXFORD LLP

21 *Attorney for Plaintiffs*

Attorney for Defendant General Motors LLC

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED,**

23
24
25 Dated: December 7, 2018



HON. JACQUELINE SCOTT CORLEY

UNITED STATE MAGISTRATE JUDGE