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26 Attorneys for Plaintiffs

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

RYAN HINDSMAN, DIANA MIRANDA,  
VANESSA MARYANSKI, RENE MITCHELL,  
and BRITTANY CHAMBERS, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC, a Delaware limited  
liability company,

Defendant.

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

**JOINT STIPULATION TO CONTINUE STAY**

1 Plaintiffs Ryan Hindsman, Diana Miranda, Vanessa Maryanski, Rene' Mitchell, and Brittany  
2 Chambers (collectively, "Plaintiffs"), and Defendant General Motors LLC ("GM"), by and through  
3 counsel jointly stipulate to a further stay of this case pending resolution through settlement. In support,  
4 the parties would show:

5 WHEREAS, the Court previously issued an order staying this action until March 5, 2019 and  
6 rescheduling the Case Management Conference for March 28, 2019, pending completion of a mediation  
7 and related settlement negotiations (Dkt. No. 65);

8 WHEREAS, this case is one of three related nationwide class actions pending, the others being  
9 *Sanchez v. General Motors LLC*, No. 1:18-cv-2536 (N.D. Ill.) (the "Illinois Action"), and *Berman v.*  
10 *General Motors LLC*, No. 2:18-cv-1437 (S.D. Fla.) (the "Florida Action");

11 WHEREAS, after completing a second mediation session with Hon. Jay Gandhi (Ret.) at the  
12 JAMS Resolution Center in Los Angeles on November 7, 2018, the parties reached agreement on all  
13 substantive terms of a nationwide class settlement in the Florida Action that will encompass all of the  
14 claims, parties and proposed class members in this Action and the Illinois Action. Since that time, the  
15 parties have worked together to resolve the language of and details of the Settlement Agreement;

16 WHEREAS, the parties are finalizing the Settlement Agreement and related documentation that  
17 they anticipate executing and presenting for preliminary approval by the Court in the Florida Action  
18 within approximately 30 days;

19 WHEREAS, simultaneous to executing the Settlement Agreement, the parties have agreed to  
20 dismiss this Action and the Illinois Action without prejudice; and

21 WHEREAS, the parties jointly request a 90-day stay extension of the current stay in this action  
22 permit completion and execution of the Settlement Agreement;

23 IT IS HEREBY STIPULATED, by and between Plaintiffs and Defendant, by and through their  
24 undersigned counsel of record, subject to the Court's approval, that the Court may enter its order as  
25 follows:

- 26 1. The case is stayed until June 5, 2019, pending further order of the Court;
- 27
- 28

1           2. The Case Management Conference currently scheduled for March 28, 2019 is removed from  
2 the Court's calendar subject to rescheduling by the Court on or after June 27, 2019 or any subsequent  
3 date convenient to the Court.

4  
5 Dated: March 21, 2019

6 /s/ Robert Ahdoot

/s/ Gregory R. Oxford

7 AHDOOT & WOLFSON PC

ISAACS CLOUSE CROSE & OXFORD LLP

8 *Attorneys for Plaintiffs*

*Attorneys for Defendant General Motors LLC*

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12 **PURSUANT TO STIPULATION, IT IS SO ORDERED,** the case management conference is  
13 continued to July 11, 2019. A joint statement is due by July 3, 2019.

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15 Dated: March 22, 2019

  
16 HON. JACQUELINE SCOTT CORLEY  
17 UNITED STATE MAGISTRATE JUDGE  
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