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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

BILL GAINES and WANDA GAINES, Plaintiff, vs. FCA US, LLC; and DOES 1 through 10, inclusive, Defendants.	Case No.: 2:24-cv-03522-JAM-CKD **STIPULATION FOR ORDER TO CONTINUE THE DISPOSITIONAL DEADLINE AND RETAIN JURISDICTION**

TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

RECORD:

This Stipulation is entered into by and between the Parties, Plaintiff BILL GAINES and WANDA GAINES ("Plaintiff") and Defendant FCA US, LLC ("Defendant") (collectively "Parties"), by and through their respective attorneys of record based upon the following facts:

WHEREAS, on September 16, 2025 Plaintiff accepted FCA US, LLC's Rule 68 Offer;

WHEREAS, on October 23, 2025, this Court entered Judgment in favor of Plaintiff;

WHEREAS, dispositional documents are currently due on January 7, 2026;

WHEREAS, the Parties respectfully request an additional 90 days as the vehicle surrender is pending and Plaintiffs are filing a Motion for Attorneys' Fees, Costs, and Expenses by January 7, 2026. The Parties are working together to ensure vehicle surrender is completed.

WHEREAS, after several meet and confers on Plaintiffs' attorneys' fees and costs, the Parties were unfortunately unable to reach a resolution. The Parties sincerely apologize to Court on the delay and greatly appreciate an extension for 90 days so the motion can be heard. After payment of fees and costs, the Plaintiffs will file dispositional documents;

ACCORDINGLY, the Parties are in agreement that the Court continue the

filing deadline for filing dispositional documents from January 7, 2026 to April 7, 2026, and continue jurisdiction until Plaintiff's attorneys' fees, costs, and expenses are decided and funding is satisfied.

THE PARTIES HEREBY STIPULATE, through the undersigned counsel, that the Court continue the filing deadline for filing dispositional document from January 7, 2026 to April 7, 2026, and continue jurisdiction until Plaintiff's attorneys' fees, costs, and expenses are decided.

Dated: January 2, 2026

STRATEGIC LEGAL PRACTICES, APC

/s/ Angel M. Baker

Tionna Carvalho
Angel M. Baker
Attorneys for Plaintiff,
BILL GAINES and WANDA GAINES

Dated: January 2, 2026

PARK LAWLESS & TREMONTI LLP

/s/ Steven D. Park

Steven D. Park
John R. Lawless
Vincent Tremonti
Charles C. Cavanagh
Attorneys for Defendant,
FCA US, LLC

ATTESTATION

I attest that concurrence in the filing of this document has been obtained from the other Signatory, which shall serve in lieu of their signature on the document.

Dated: January 2, 2026

/s/ Angel M. Baker
Angel M. Baker

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

BILL GAINES and WANDA GAINES,
Plaintiff,

v.

FCA US, LLC,

Defendant.

Case No.: 2:24-cv-03522-JAM-CKD

ORDER GRANTING STIPULATION FOR ORDER TO CONTINUE THE DEADLINE TO FILE DISPOSITIONAL DOCUMENTS AND JURISDICTION

On January 2, 2026, both Parties filed a Stipulation to Continue Court's Jurisdiction Over Settlement filed by the parties.

The Court, having considered the Parties' Stipulation and finding good cause therefore, hereby **GRANTS** the Stipulation and **ORDERS** as follows:

1. The Court **CONTINUES** the deadline to file dispositional documents from January 7, 2026 to **April 07, 2026**; and
2. The Court retains Jurisdiction over the action until Plaintiff's fees, costs, and expenses are decided and funding satisfied.

IT IS SO ORDERED.

Dated: January 07, 2026

JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE