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**UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA**

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16 NANCY TURGEON, on behalf of herself and all
 17 others similarly situated,

Case No.: 2:17-cv-00473-MCE-AC

18 Plaintiff,

**JOINT STIPULATION AND ORDER
 REGARDING NEW DISCOVERY AND
 MOTIONS DEADLINES**

19 vs.

20 WHIRLPOOL CORP.,

21 Defendant.

Judge Morrison C. England, Jr.

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23 Plaintiff Nancy Turgeon, individually and on behalf of all others similarly situated
 24 (“Plaintiff”), and Defendant Whirlpool Corporation (“Whirlpool” or “Defendant), collectively the
 25 “Parties,” through their respective undersigned counsel, submit the following Joint Stipulation and
 26 [Proposed] Order Regarding New Discovery and Motions Deadlines.

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1 1. On March 3, 2017, the Court entered an Initial Pretrial Scheduling Order (ECF
2 No. 3), which included deadlines related to discovery, disclosure of expert witnesses, dispositive
3 motions, and trial.

4 2. On June 16, 2017, the Parties filed their Joint 26(f) Report and Joint Objections to
5 Initial Pretrial Scheduling Order (“Joint Report”) (ECF No. 13), proposing a bifurcated approach to
6 scheduling that would set deadlines related to class certification now but postpone the setting of
7 merits-related deadlines (if necessary) until after the Court’s class certification ruling.

8 3. On June 26, 2017, the Court entered a Minute Order (ECF No. 14) ordering the
9 Parties to file a Joint Stipulation and [Proposed] Order addressing the proposed new discovery and
10 motion deadlines.

11 4. The Parties conferred several times about scheduling and discovery-related issues,
12 including during telephone conferences held on May 15, May 17, May 19, and June 14, 2017.

13 5. The Parties agree that the bifurcated approach to scheduling and the related deadlines
14 outlined in the Parties’ Joint Report (ECF No. 13) should be adopted by the Court because (1) the
15 bifurcated approach, which the court used in *Kljajic v. Whirlpool*, Case No. 1:15-cv-05980 (N.D.
16 Ill.), facilitates a more efficient and targeted approach to discovery by saving post-certification
17 questions for a time when the Parties have a better understanding of the case and a better sense of
18 what merits-related discovery is needed to proceed to trial, and (2) the deadlines the Parties propose
19 are intended to enhance efficiency by dovetailing with the deadlines in *Whitley v. Whirlpool Corp.*,
20 Case No.: 8:16-cv-1704 CJC (DFM) (C.D. Cal.), a factually similar putative class action currently
21 pending in the Central District of California.

22 WHEREFORE, the Parties stipulate to the following class-certification discovery and
23 motions deadlines and request that the Court enter the same:

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Event	Parties’ Proposed Deadline
Initial Disclosures	6/30/17
Amend Pleadings or Add Parties	9/25/17

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Class Fact Discovery Cutoff	3/30/18
Expert Witness Disclosures	Plaintiff's class experts: 5/14/18 Defendant's class experts: 6/28/18 Parties' rebuttal experts: 7/30/18
Class Expert Witness Discovery Cutoff	8/30/18
Class Certification and Motions Challenging Experts	Plaintiff's class motion: 10/1/18 Defendants' opposition and Daubert challenges: 11/9/18 Plaintiff's reply and Daubert challenges: 11/30/18

Dated: June 30, 2017

WHEELER TRIGG O'DONNELL LLP

By: /s/ Andrew M. Unthank

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Dated: June 30, 2017

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ORDER

Having reviewed the Parties' Joint Stipulation Regarding New Discovery and Motions Deadlines and good cause having been shown, the Parties' request is GRANTED. The Initial Pretrial Scheduling Order (ECF No. 3) shall be amended to reflect the following class-certification discovery and motions deadlines.

Event	Parties' Proposed Deadline
Initial Disclosures	6/30/17
Amend Pleadings or Add Parties	9/25/17
Class Fact Discovery Cutoff	3/30/18
Expert Witness Disclosures	Plaintiff's class experts: 5/14/18 Defendant's class experts: 6/28/18 Parties' rebuttal experts: 7/30/18
Class Expert Witness Discovery Cutoff	8/30/18
Class Certification and Motions Challenging Experts	Plaintiff's class motion: 10/1/18 Defendants' opposition and Daubert challenges: 11/9/18 Plaintiff's reply and Daubert challenges: 11/30/18

The parties are further ordered to meet and confer and file with the Court proposed merits-related deadlines (if necessary) not later than 20 days after the Court's class certification ruling.

IT IS SO ORDERED.

Dated: July 11, 2017


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE