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26 Attorneys for Defendant
27 FCA US LLC f/k/a Chrysler Group LLC

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

SHAWN ALGER as an individual and on behalf of all others similarly situated,

Plaintiff,

v.

FCA US LLC f/k/a CHRYSLER GROUP LLC, a Delaware Corporation, and DOES 1 through 100, inclusive,

Defendants.

Case No.: 2:18-cv-00360-MCE-EFB

**STIPULATION AND ORDER
EXTENDING DISCOVERY DEADLINES**

Assigned to Hon. Morrison C. England, Jr.
Courtroom 7, 14th Floor
Complaint Filed: February 16, 2018

1 Plaintiff Shawn Alger (“Plaintiff”) and Defendant FCA US LLC f/k/a Chrysler Group LLC
2 (“Defendant”) (together, the “Parties”), by and through their respective counsel, hereby stipulate as
3 follows:

4 **STIPULATION**

5 WHEREAS, Plaintiff filed his initial complaint on February 15, 2018 [Dkt. No. 1] and his
6 class action complaint on February 16, 2018 [Dkt. No. 4];

7 WHEREAS, Plaintiff filed his Second Amended Complaint (“SAC”) on April 23, 2018 [Dkt.
8 No. 13] and Defendant filed its Answer to the SAC on May 14, 2018 [Dkt. No. 14];

9 WHEREAS, Plaintiff served his initial disclosures on September 19, 2018 and Defendant
10 served its initial disclosures and supplemental initial disclosures on September 28, 2018;

11 WHEREAS, the Court entered an order on January 4, 2019 extending the discovery cut-off
12 to March 18, 2019 [Dkt. No. 43];

13 WHEREAS, on March 4, 2019, the Court entered an order on stipulated class certification
14 deadlines and to extend the discovery cut-off to November 30, 2019 [Dkt. No. 47];

15 WHEREAS, pursuant to the Parties’ stipulation and the Court’s March 4, 2019 Order,
16 Plaintiff filed his motion for class certification on April 30, 2019;

17 WHEREAS, on January 20, 2020 the Court entered an order pursuant to the parties’
18 stipulation extending the discovery cut-off date to March 30, 2020 (Dkt 136);

19 WHEREAS, on February 18, 2020 the Court entered an order Granting Class Certification;

20 WHEREAS, the parties now desire to engage in mediation to determine if resolution of this
21 case is possible and seek to extend the discovery cut-off deadline to allow sufficient time to conduct
22 mediation;

23 NOW, THEREFORE, the undersigned counsel for the Parties, having met and conferred,
24 stipulate and agree as follows:

- 25 1. The deadline to complete merits-based discovery is extended to June 15, 2020. All
26 other case deadlines shall be adjusted accordingly, consistent with the Court’s Initial
27 Pretrial Scheduling Order [Dkt. No. 3].

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2. If resolution of this case is not achieved on or before May 15, 2020, plaintiff shall file a motion seeking approval of a plan to provide notice to the class.

Dated: March 18, 2020.

Respectfully submitted,
KERSHAW, COOK & TALLEY PC

By: /s/ Stuart C. Talley
STUART C. TALLEY
WILLIAM A. KERSHAW
IAN J. BARLOW

Attorneys for Plaintiff and the putative Class

Dated: March 18, 2020.

DYKEMA GOSSETT LLP


By: /s/ Fred J. Fresard
FRED J. FRESARD
DOMMOND E. LONNIE
JAMES P. FEENEY
ABIRAMI GNANADESIGAN

Attorneys for Defendant
FCA US LLC f/k/a/ Chrysler Group LLC

ORDER

IT IS SO ORDERED.

DATED: March 23, 2020



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE