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

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

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

33 Plaintiff,

34 v.

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

38 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 6, 2020 the Court entered an order pursuant to the parties’ stipulation  
18 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, on March 23, 2020 the Court entered an order pursuant to the parties’ stipulation  
21 extending the discovery cut-off date to June 15, 2020 (Dkt 145);

22 WHEREAS, on May 7, 2019 the parties engaged in a mediation before the Honorable Layne  
23 Phillips and continue to engage in settlement discussions in the hope of obtaining resolution of this  
24 case; and

25 WHEREAS, the parties desire to further continue the discovery cut-off date for 90 days in  
26 order to continue settlement discussions.

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

1 The deadline to complete previously noticed depositions, as well as the depositions of Dr.  
2 Bruce Davis and Dr. Mariusz Ziejewski, is continued to September 10, 2020. All other case  
3 deadlines shall be adjusted accordingly, consistent with the Court's Initial Pretrial Scheduling  
4 Order [Dkt. No. 3].

5 Dated: June 15, 2020.

Respectfully submitted,

KERSHAW, COOK & TALLEY PC

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8 By: /s/ Stuart C. Talley

STUART C. TALLEY  
WILLIAM A. KERSHAW  
IAN J. BARLOW

11 Attorneys for Plaintiff and the putative Class

12 Dated: June 15, 2020

DYKEMA GOSSETT LLP

13  
14 By: /s/ Fred J. Fresard

FRED J. FRESARD  
DOMMOND E. LONNIE  
JAMES P. FEENEY  
ABIRAMI GNANADESIGAN

17 Attorneys for Defendant

18 FCA US LLC f/k/a/ Chrysler Group LLC

19  
20 **ORDER**

21 IT IS SO ORDERED.

22 Dated: June 16, 2020

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25 MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE