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

**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

JOINT STIPULATION AND ORDER TO MODIFY SCHEDULED DISCOVERY CUT-OFF DATE AND CLASS NOTICE

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, on January 20, 2020 the Court entered an order pursuant to the parties’
8 stipulation extending the discovery cut-off date to March 30, 2020 (Dkt. No. 136);

9 WHEREAS, on February 18, 2020 the Court entered an order Granting Class Certification
10 (Dkt. No. 141);

11 WHEREAS, on March 23, 2020, the Court entered an order pursuant to the parties’ stipulation
12 extending the discovery cut-off date to June 15, 2020 to allow sufficient time to conduct mediation
13 (Dkt. No. 145);

14 WHEREAS, on May 7, 2020 the parties engaged in a mediation that did not resolve in
15 settlement.

16 WHEREAS, on June 17, 2020 the court entered an order extending the time for the
17 completion of certain depositions to September 10, 2020 so that the parties could continue their
18 mediation efforts (Dkt. No. 156);

19 WHEREAS, on August 11, 2020 the Court entered an order requiring Notice to the Class to
20 be disseminated by no later than September 20, 2020 (Dkt. No. 158);

21 WHEREAS, the parties now desire to engage in second mediation on October 1, 2020 to
22 determine if resolution of this case is possible and seek to extend the notice deadline and the deadline
23 for conducting remaining discovery to allow sufficient time to conduct mediation;

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

- 26 1. The deadline to complete the depositions of previously noticed FCA US fact witnesses
27 is extended to December 18, 2020. All other case deadlines shall be adjusted accordingly,
28 consistent with the Court’s Initial Pretrial Scheduling Order (Dkt. No. 3).

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2. The deadline for the Claims Administrator to disseminate notice to the Class is extended to November 11, 2020.

Dated: August 28, 2020.

Respectfully submitted,

KERSHAW, COOK & TALLEY PC

By: /s/ Stuart C. Talley
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Attorneys for Plaintiff and the Class

Dated: August 28, 2020.

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

ORDER

IT IS SO ORDERED.

Dated: August 28, 2020



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