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

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

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

23 Plaintiff,

24 v.

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

28 Defendants.

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

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

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 21, 2020 the court entered an order extending the time for the
20 completion of certain depositions to December 18, 2020 (Dkt. No. 160);

21 WHEREAS, following the entry of this order a dispute arose concerning whether the
22 defendant was required to supplement its prior document production prior to the depositions and the
23 extent of the supplementation;

24 WHEREAS, following an informal discovery conference with the Magistrate, the parties
25 reached an agreement on the extent and nature of defendant’s supplementation obligation;

26 WHEREAS, defendant believes it will need until at least January 15, 2021 to supplement its
27 document production;

28

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

3 The deadline to complete the depositions of previously noticed FCA US fact
4 witnesses is extended to March 15, 2021. All other case deadlines shall be adjusted
5 accordingly, consistent with the Court's Initial Pretrial Scheduling Order [Dkt. No.
6 3].

7
8
9 Dated: December 29, 2020

Respectfully submitted,

KERSHAW, COOK & TALLEY PC

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Dated: December 29, 2020

DYKEMA GOSSETT LLP

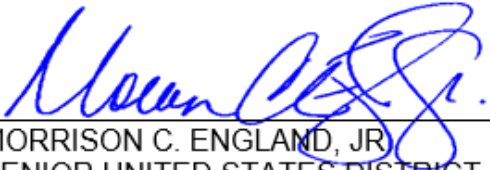
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Attorneys for Defendant
FCA US LLC f/k/a/ Chrysler Group LLC

ORDER

IT IS SO ORDERED.

Dated: January 4, 2021



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