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

27 **UNITED STATES DISTRICT COURT**
28 **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 EXPERT DISCOVERY
SCHEDULE**

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, on January 4, 2021 the court entered an order extending the time for the
22 completion of certain depositions to March 15, 2021 (Dkt. No. 169);

23 WHEREAS, following the entry of this order the parties have met and conferred concerning
24 the nature and extent of the defendant’s duty to supplement its discovery responses.

25 WHEREAS, the defendant needs additional time to supplement its discovery responses and
26 those supplemental responses will likely impact the expert reports that are due to be exchanged on
27 May 14, 2021; and

28 ///

1 WHEREAS, the parties believe that efficiencies will be achieved if the deadline to exchange
2 expert and rebuttal expert reports is extended for a period of 45 days while keeping all other
3 deadlines in place.

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

- 6 1. The deadline to disclose experts and exchange reports shall be June 30, 2021; and
- 7 2. The deadline to disclose supplemental experts and exchange reports shall be August
8 13, 2021.

9 Dated: May 4, 2021

Respectfully submitted,

10 **KERSHAW, COOK & TALLEY PC**

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Dated: May 4, 2021

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

ORDER

IT IS SO ORDERED.

Dated: May 10, 2021



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