

1 **KERSHAW TALLEY BARLOW PC**  
 2 William A. Kershaw (State Bar No. 057486)  
 3 Stuart C. Talley (State Bar No. 180374)  
 4 Ian J. Barlow (State Bar No. 262213)  
 5 401 Watt Avenue  
 6 Sacramento, California 95864  
 7 Telephone: (916) 779-7000  
 8 Facsimile: (916) 244-4829  
 9 Email: bill@ktblegal.com  
 10 Email: stuart@ktblegal.com  
 11 Email: ian@ktblegal.com

12 Attorneys for Plaintiff and the Class  
 13 [Additional counsel listed on signature page]

14 **KLEIN THOMAS & LEE PLLC**  
 15 Fred J. Fresard (*Pro Hac Vice*)  
 16 Ian K. Edwards (*Pro Hac Vice*)  
 17 Anthony Thomas (State Bar No. 149284)  
 18 1100 Town and Country Rd  
 19 Orange, California 92868  
 20 Telephone: (714) 543-3446  
 21 Email: fred.fresard@kleinthomaslaw.com  
 22 Email: ian.edwards@kleinthomaslaw.com  
 23 Email: tony.thomas@kleinthomaslaw.com

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

26 **UNITED STATES DISTRICT COURT**

27 **EASTERN DISTRICT OF CALIFORNIA**

28 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  
 RE-OPEN DISCOVERY**

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

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

**STIPULATION**

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

WHEREAS, discovery in this case closed on March 15, 2021 (Dkt. No. 169);

WHEREAS, plaintiff seeks additional supplemental discovery and to re-open discovery for the purpose of authenticating and confirming the admissibility of documents produced by defendant and third parties in discovery.

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

1. On or before January 13, 2023, Defendant will supplement its discovery by providing the following:
  - Updated warranty data through October 31, 2022.
  - Updated CAIRs data through October 31, 2022.
  - Updated correspondence with NHTSA through October 31, 2022.
  - New failure rate projections.
2. Plaintiff will provide a list of documents he intends to use at trial. Thereafter, the parties will meet and confer with respect to the admissibility of the documents. If the parties cannot reach agreement within 20 days of submitting the documents, plaintiff may re-open discovery for the limited purpose of establishing the admissibility of the contested documents.

Dated: November 21, 2022

Respectfully submitted,

**KERSHAW TALLEY BARLOW PC**

By: /s/ Stuart C. Talley  
STUART C. TALLEY  
WILLIAM A. KERSHAW  
IAN J. BARLOW  
401 Watt Avenue  
Sacramento, California 95864  
Telephone: (916) 779-7000  
Facsimile: (916) 721-2501

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Email: bill@ktblegal.com  
Email: stuart@ktblegal.com  
Email: ian@ktblegal.com

MARK P. CHALOS (*Pro Hac Vice*)  
KENNETH S. BYRD (*Pro Hac Vice*)  
MADELINE M. GOMEZ (*Pro Hac Vice*)  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
222 Second Avenue South, Suite 1640  
Nashville, Tennessee 37201  
Telephone: (615) 313-9000  
Facsimile: (615) 313-9965  
Email: mchalos@lchb.com  
Email: kbyrd@lchb.com  
Email: mgomez@lchb.com

Attorneys for Plaintiff and the Class

Dated: November 21, 2022

KLEIN THOMAS & LEE PLLC

By: /s/ Fred J. Fresard  
FRED J. FRESARD (*Pro Hac Vice*)  
IAN K. EDWARDS (*Pro Hac Vice*)  
ANTHONY THOMAS  
1100 Town and Country Rd  
Orange, CA 92868  
Telephone: (714) 543-3446  
Email: fred.fresard@kleinthomaslaw.com  
Email: ian.edwards@kleinthomaslaw.com  
Email: tony.thomas@kleinthomaslaw.com

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

**ORDER**

Good cause having been shown, the parties' stipulation is ADOPTED as the order of this Court. Plaintiffs' Motion to Reopen Discovery (ECF No. 227) is DENIED as moot.

IT IS SO ORDERED.

Dated: November 28, 2022

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