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10 Attorneys for Defendant
FCA US LLC f/k/a CHRYSLER GROUP LLC
11

12 **UNITED STATES DISTRICT COURT**
13 **EASTERN DISTRICT OF CALIFORNIA**
14 **SACRAMENTO DIVISION**

15 SHAWN ALGER as an individual and on behalf
16 of all others similarly situated,

17 Plaintiff,

18 vs.

19 FCA US LLC f/k/a CHRYSLER GROUP LLC, a
Delaware Corporation, and DOES 1 through 100,
20 inclusive ,

21 Defendants.
22

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

Assigned to:
Hon. Morrison C. England, Jr.

**JOINT STIPULATION TO CONTINUE
HEARING DATE TO OCTOBER 31, 2018**

DATE: October 31, 2018
TIME: 10 a.m.
JUDGE: Hon. Edmund F. Brennan
CTRM: 8, 13th Floor

23 **JOINT STIPULATION TO**
24 **CONTINUE HEARING DATE TO OCTOBER 31, 2018**

25 Plaintiff SHAWN ALGER, AS AN INDIVIDUAL AND ON BEHALF OF ALL OTHERS
26 SIMILARLY SITUATED (“Plaintiff”) and Defendant FCA US LLC, formerly known as
27 CHRYSLER GROUP, LLC (“Defendant”), by and through their attorneys of record in this case,
28 stipulate and agree as follows:

1 WHEREAS, on September 14, 2018, Plaintiff filed a Notice of Motion and Motion Regarding
2 Discovery Disagreement, setting October 10, 2018, as the hearing date (Doc. #27);

3 WHEREAS, on September 19, 2018, Defendant filed a Notice of Motion and Motion to
4 Compel, also setting October 10, 2018, as the hearing date (Doc. #29).

5 WHEREAS, pursuant to Local Rule 251, the Parties are to file a Joint Statement Regarding
6 Discovery Disagreement on or before October 3, 2018;

7 WHEREAS, the Parties are continuing to meet and confer, in earnest, in order to further
8 resolve and narrow the discovery disputes. Both Parties believe additional time is needed to resolve
9 and narrow the discovery disputes;

10 IT IS HEREBY STIPULATED by and between Plaintiff and Defendant that the hearing date
11 on Plaintiff's Motion (Doc. #27) and Defendant's Motion (Doc. #29) be continued to October 31,
12 2018, at 10 a.m., or as soon thereafter as this matter may be heard. If the discovery disputes cannot
13 be resolved in the interim, then the Parties will file a Joint Statement Regarding Discovery
14 Disagreement on or before October 24, 2018, as required by Local Rule 251.

15
16 Dated: October 3, 2018

Dykema Gossett LLP
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Abirami Gnanadesigan
Brittany J. Mouzourakis

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20 By: /s/ Fred J. Fresard
21 James P. Feeney
22 Fred J. Fresard
23 Dommond E. Lonnie
24 Abirami Gnanadesigan
25 Brittany J. Mouzourakis
26 Attorneys for Defendant
27 FCA US LLC f/k/a CHRYSLER GROUP LLC

26 Dated: October 3, 2018

KERSHAW, COOK & TALLEY PC
William A. Kershaw
Stuart C. Talley
Ian J. Barlow

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By: /s/Ian J. Barlow
(As authorized on October 3, 2018)
William A. Kershaw
Stuart C. Talley
Ian J. Barlow
Attorneys for PLAINTIFF AND THE
PUTATIVE CLASS

~~[PROPOSED]~~ ORDER

The Court, having considered the Stipulation to Continue Hearing Date to October 31, 2018, submitted herewith, and good cause appearing, hereby enters the following order:

1. The October 10, 2018, hearing date on Plaintiff's Motion (Doc. #27) and Defendant's Motion (Doc. #29) is continued to October 31, 2018, at 10 a.m.
2. If the discovery disputes cannot be resolved in the interim, then the Parties shall file a Joint Statement Regarding Discovery Disagreement on or before October 24, 2018, as required by Local Rule 251.

IT IS SO ORDERED.

Dated: October 4, 2018.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE