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12 Attorneys for Plaintiff and the putative Class

13 **UNITED STATES DISTRICT COURT**  
 14 **EASTERN DISTRICT OF CALIFORNIA**

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

17 Plaintiff,

18 v.

19 FCA US LLC f/k/a CHRYSLER GROUP  
 20 LLC, a Delaware Corporation, and DOES  
 21 1 through 100, inclusive,

22 Defendants.

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

**JOINT STIPULATION TO CONTINUE  
 HEARING DATE TO NOVEMBER 7, 2018;  
 [PROPOSED] ORDER**

DATE: October 31, 2018

TIME: 10:00 a.m.

JUDGE: Hon. Edmund F. Brennan

DEPT.: Courtroom 8, 13<sup>th</sup> Floor

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

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

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

3 WHEREAS, on October 4, 2018, pursuant to a Joint Stipulation submitted by the parties  
4 (Doc. #32), the Court entered an Order continuing the hearing date on the parties' discovery  
5 motions to October 31, 2018 (Doc. #33);

6 WHEREAS, pursuant to Local Rule 251, the Parties are to file a Joint Statement Regarding  
7 Discovery Disagreement on or before October 24, 2018;

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

11 IT IS HEREBY STIPULATED by and between Plaintiff and Defendant that the hearing  
12 date on Plaintiff's Motion (Doc. #27) and Defendant's Motion (Doc. #29) be continued to  
13 November 7, 2018, at 10 a.m., or as soon thereafter as this matter may be heard. If the discovery  
14 disputes cannot be resolved in the interim, then the Parties will file a Joint Statement Regarding  
15 Discovery Disagreement on or before October 31, 2018, as required by Local Rule 251.

16 Dated: October 23, 2018.

Respectfully submitted,

17 KERSHAW, COOK & TALLEY PC

18 By: /s/ Stuart C. Talley

19 STUART C. TALLEY  
20 WILLIAM A. KERSHAW  
21 IAN J. BARLOW

Attorneys for Plaintiff and the putative Class

22 Dated: October 23, 2018.

DYKEMA GOSSETT LLP

23 By: /s/ Fred J. Fresard

24 DOMMOND E. LONNIE  
25 JAMES P. FEENEY  
26 FRED J. FRESARD  
27 ABIRAMI GNANADESIGAN  
28 BRITTANY MOUSOURAKIS

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

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[PROPOSED] ORDER

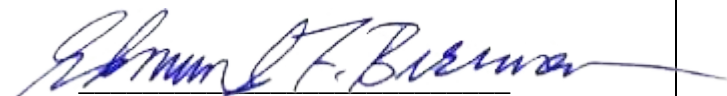
The Court, having considered the Stipulation to Continue Hearing Date to November 7, 2018, submitted herewith, and good cause appearing, hereby enters the following order:

1. The October 31, 2018, hearing date on Plaintiff's Motion (Doc. #27) and Defendant's Motion (Doc. #29) is continued to November 7, 2018, at 10:00 a.m., or as soon thereafter as this matter may be heard.

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 31, 2018, as required by Local Rule 251.

IT IS SO ORDERED.

Dated: October 24, 2018



Hon. Edmund F. Brennan  
U.S. Magistrate Judge