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

28 **UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

29 SHAWN ALGER as an individual and on  
30 behalf of all others similarly situated,

31 Plaintiff,

32 v.

33 FCA US LLC f/k/a CHRYSLER GROUP  
34 LLC, a Delaware Corporation, and DOES 1  
35 through 100, inclusive,

36 Defendants.

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

38 **STIPULATION AND ORDER**  
**REGARDING CLASS CERTIFICATION**  
**BRIEFING SCHEDULE AND CLOSE OF**  
**MERITS DISCOVERY**

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

42 Plaintiff Shawn Alger (“Plaintiff”) and Defendant FCA US LLC f/k/a Chrysler Group LLC

1 (“Defendant”) (together, the “Parties”), by and through their respective counsel, hereby stipulate as  
2 follows:

3 **STIPULATION**

4 WHEREAS, this case is a class action lawsuit wherein plaintiff alleges that certain models of  
5 vehicles manufactured by defendant are defective;

6 WHEREAS, the parties have been engaged in discovery since the commencement of this  
7 action in an effort to ensure that plaintiff has sufficient evidence to file a Motion for Class  
8 Certification;

9 WHEREAS, the parties desire to put in place a class certification briefing schedule that will  
10 ensure that each party is provided sufficient time to respond to the various arguments presented by  
11 the opposing party;

12 WHEREAS, in the interest of judicial economy and to prevent the unnecessary expenditure  
13 of resources, the parties also desire to extend the discovery cut-off date in this case so that additional,  
14 merits-based discovery can be finalized following the court’s ruling on plaintiff’s Motion for Class  
15 Certification.

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

- 18 1. On or before April 30, 2019 Plaintiff will file his Motion for Class Certification.
- 19 2. To the extent Plaintiff submits any declarations or reports from experts to support his  
20 Motion for Class Certification, he shall also provide defense counsel with dates that  
21 such experts will be available for deposition within 30 days of the submission of such  
22 reports or declarations.
- 23 3. Defendant’s opposition to Plaintiff’s Motion for Class Certification will be filed on  
24 or before June 30, 2019.
- 25 4. To the extent Defendant submits any declarations or reports from experts to support  
26 its Response in Opposition to Plaintiff’s Motion for Class Certification, it shall also  
27 provide Plaintiff’s counsel with dates that such experts will be available for  
28 deposition within 30 days of the submission of such reports or declarations.

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- 5. Plaintiffs' reply in support of his Motion for Class Certification will be filed on or before July 30, 2019.
- 6. The page limits on the Motion for Class Certification shall be as follows: Plaintiff's Motion for Class Certification 30 pages, Defendant's Opposition to Motion for Class Certification 30 pages; Plaintiff's Reply Brief in Support of Motion for Class Certification 15 pages.
- 7. The deadline to complete merits-based discovery is November 30, 2019.

Dated: February 27, 2019

Respectfully submitted,  
  
KERSHAW, COOK & TALLEY PC

By: /s/ Stuart C. Talley  
STUART C. TALLEY  
WILLIAM A. KERSHAW  
IAN J. BARLOW

Attorneys for Plaintiff and the putative Class

Dated: February 27, 2019

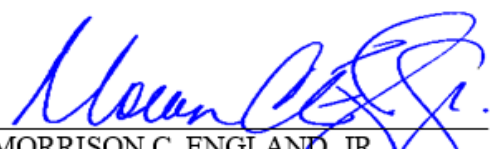
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By: /s/ Fred J. Fresard  
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Attorneys for Defendant  
FCA US LLC f/k/a/ Chrysler Group LLC

IT IS SO ORDERED.

Dated: March 4, 2019

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE