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12 **UNITED STATES DISTRICT COURT**
 13
 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 1
 through 100, inclusive,

21 Defendants.

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

**STIPULATION TO EXTEND CLASS
 CERTIFICATION BRIEFING
 SCHEDULE; ORDER**

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

23
 24 Pursuant to Eastern District of California Local Rules 143 and 144, Plaintiff Shawn Alger
 25 (“Plaintiff”) and Defendant FCA US LLC f/k/a Chrysler Group LLC (“Defendant” or “FCA US”)
 26 (collectively, the “Parties”), by and through their attorneys of record, hereby stipulate as follows:

27 **STIPULATION**

28 WHEREAS, this case is a putative class action lawsuit wherein Plaintiff alleges that certain

1 models of vehicles manufactured by Defendant are defective;

2 WHEREAS, the Parties previously negotiated a schedule for briefing class certification and
3 completing merits discovery, where Plaintiff's deadline to file his motion for class certification was
4 April 30, 2019, Defendant's deadline to file its opposition was June 30, 2019, and the deadline for
5 Plaintiff's reply in support of his motion for class certification was July 30, 2019. The proposed
6 deadline to complete merits-based discovery was November 30, 2019. These deadlines were set
7 forth in the Parties' Stipulation and [Proposed] Order Regarding Class Certification Briefing
8 Schedule and Close of Merits Discovery, filed on February 27, 2019. (Dkt. No. 46.);

9 WHEREAS, on March 4, 2019, the Court entered an Order granting the Parties' proposed
10 schedule on class certification and merits discovery. (Stip. and Order Regarding Class Cert.
11 Briefing Schedule and Close of Merits Disc.) (Dkt. No. 47.)

12 WHEREAS, pursuant to the Court's Order, Plaintiff filed his motion for class certification
13 and accompanying documents on April 30, 2019.

14 WHEREAS, on or around April 29, 2019, Defendant contacted Plaintiff to request a two-
15 week extension for filing its opposition to Plaintiff's class certification motion due to a vacation that
16 defense counsel had scheduled for June;

17 WHEREAS, after meeting and conferring, the Parties agreed that Defendant's deadline to
18 oppose Plaintiff's class certification motion would be extended by two weeks and that Plaintiff's
19 deadline to file his reply in support of class certification would also be extended by two weeks.

20 WHEREAS, no previous extensions of time have been sought by the Parties as to the briefing
21 schedule for class certification.

22 NOW, THEREFORE, the undersigned counsel for the Parties, having met and conferred and
23 good cause appearing, stipulate and agree as follows:

- 24 1. Defendant's opposition to Plaintiff's Motion for Class Certification will be due on or
25 before July 15, 2019, along with any declarations or reports from experts in support
26 of same.
- 27 2. Plaintiff's reply in support of his Motion for Class Certification will be due on or
28 before August 30, 2019.

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Dated: June 7, 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: June 7, 2019

DYKEMA GOSSETT LLP


By: /s/ Fred J. Fresard
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BRITTANY J. MOUZOURAKIS (pro hac vice)
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Attorneys for Defendant
FCA US LLC f/k/a/ Chrysler Group LLC

ORDER

IT IS SO ORDERED.

Dated: June 11, 2019


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE