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 TIFFENY NANCE

7  
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9 **UNITED STATES DISTRICT COURT**  
 10 **EASTERN DISTRICT OF CALIFORNIA**

11 TIFFENY NANCE, on behalf of herself  
 and the Class Members,

12  
 13 **Plaintiff,**

14 vs.

15 RYDER INTEGRATED LOGISTICS,  
 INC., a Delaware Corporation; and RYDER  
 16 SYSTEM, INC., a Florida Corporation,

17 **Defendants.**

Case No. 2:23-cv-00477-TLN-JDP

[Assigned to the Honorable Troy L. Nunley]

**STIPULATION AND ORDER TO  
 STAY DISCOVERY FOR SIXTY  
 DAYS AND EXTEND  
 PLAINTIFF'S CLASS  
 CERTIFICATION DEADLINE BY  
 SIXTY DAYS**

Complaint Filed: March 13, 2023  
 Trial Date: None

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7 Attorneys for Defendants  
RYDER INTEGRATED LOGISTICS, INC.  
8 and RYDER SYSTEM, INC.

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1 Plaintiff Tiffeny Nance (“Plaintiff”) and Defendants Ryder Integrated Logistics, Inc.  
2 and Ryder System, Inc. (collectively, “Ryder”) (together the “Parties”), by and through their  
3 undersigned counsel, hereby enter into the below stipulation with reference to the following  
4 facts:

5 WHEREAS, on March 13, 2023, Plaintiff filed her class-action complaint for  
6 damages against Ryder in the United States District Court for the Eastern District of  
7 California, captioned *Tiffeny Nance v. Ryder Integrated Logistics, Inc. et al.*, Case No.  
8 2:23-cv-00477 (Plaintiff’s “Class Action”);

9 WHEREAS, as relevant here, there are currently two related cases pending  
10 against Ryder in the United States District Court for the Northern District of California:  
11 *Perkins v. Hadco Santa Fe Springs CA dba Ryder Integrated Logistics, Inc.*, Case No.  
12 3:23-cv-00502-WHO & 3:23-cv-01694-WHO (“*Perkins*”) and *Jose Johnson, et al. v.*  
13 *Ryder Transp. Solutions, LLC*, Case No. 4:22-cv- 07456-JST (“*Johnson*”);

14 WHEREAS, on October 24, 2023, Ryder and the parties in the *Perkins* and  
15 *Johnson* actions participated in a successful mediation and agreed to a settlement in  
16 principle that, by definition, Ryder states encompasses the putative class and claims  
17 alleged in Plaintiff’s Class Action;

18 WHEREAS, the Parties previously stipulated to extend the Phase I Discovery  
19 Cutoff deadline by sixty days to March 12, 2024; and

20 WHEREAS, on January 3, 2024, the Parties stipulated to stay discovery in this  
21 case by thirty days in exchange for Ryder providing the executed Settlement  
22 Agreement to counsel in this case when it is fully executed, to give the Parties time to  
23 meet and confer regarding the impact of the *Perkins/Johnson* settlement on this case.

24 WHEREAS, in response to the Parties’ stipulation, on January 3, 2024, the Court  
25 signed an order staying discovery for thirty days;

1 WHEREAS, on February 1, 2024, the Parties stipulated to stay discovery for  
2 another thirty days and to extend Plaintiff's deadline to file a motion for class  
3 certification by sixty days, as the *Perkins/Johnson* settlement had not been fully drafted;

4 WHEREAS, in response to the Parties' stipulation, on February 1, 2024, the  
5 Court signed an order staying discovery for thirty days and extending the deadline for  
6 Plaintiff to file a motion for class certification by thirty days, making the current  
7 deadline for Plaintiff to file her motion September 6, 2024;

8 WHEREAS, on February 29, 2024, the Parties stipulated to stay discovery for  
9 another thirty days and to extend Plaintiff's deadline to file a motion for class  
10 certification to October 7, 2024, as the *Perkins/Johnson* settlement was still undergoing  
11 revisions but near completion;

12 WHEREAS, in response to the Parties' stipulation, on February 29, 2024, the  
13 Court signed an order staying discovery for thirty days and extending the deadline for  
14 Plaintiff deadline to file a motion for class certification to October 7, 2024;

15 WHEREAS, later that day, the Parties to the *Perkins/Johnson* matter executed  
16 settlement agreement, a copy of which was provided to Plaintiff's counsel;

17 WHEREAS, on April 2, 2024, the Parties stipulated to stay discovery for another  
18 sixty days and to extend Plaintiff's deadline to file a motion for class certification to  
19 December 30, 2024, as the plaintiffs in the *Perkins/Johnson* matter represented to  
20 Defendants in this case that their Motion for Preliminary Approval would be  
21 forthcoming shortly;

22 WHEREAS, in response to the Parties' stipulation, on April 2, 2024, the Court  
23 signed an order staying discovery for sixty days and extending the deadline for Plaintiff  
24 to file a motion for class certification to December 30, 2024;

25 WHEREAS, the plaintiffs' counsel in the *Perkins/Johnson* matter filed their  
26 Motion for Preliminary Approval on April 17, 2024, for which a hearing was held on  
27 May 29, 2024, at 2:00 p.m. before the Honorable William H. Orrick of the United  
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1 States District Court for the Northern District of California and further briefing on  
2 certain issues was requested and the hearing date was continued to July 19, 2024;

3 WHEREAS, on May 17, 2024, this Court in a related case, *Tiffany Nance v.*  
4 *Ryder Integrated Logistics, Inc., et al.*, Case No. 2:23-cv-02357-TLN-JDP, agreed to  
5 continue keep the pending motions to consolidate (ECF No. 33) and motion to remand  
6 (ECF No. 15) in abeyance pending the preliminary approval hearing and subsequent  
7 ruling in the *Perkins/Johnson* matter;

8 WHEREAS, the Parties continue to meet and confer about the impact of the  
9 *Perkins/Johnson* settlement on this case in order to determine whether settlement is  
10 feasible at this juncture;

11 WHEREAS, the Parties agree that discovery in this case and all accompanying  
12 deadlines should be stayed through the Court's anticipated ruling on the plaintiffs'  
13 Motion for Preliminary Approval in the *Perkins/Johnson* matter in late July to  
14 determine its impact on this case;

15 WHEREAS, the Parties agree that discovery in this case should be stayed for an  
16 additional sixty days, all discovery deadlines should be continued by an additional sixty  
17 days, and Plaintiff should receive a commensurate sixty day extension of her deadline  
18 to file a motion for class certification;

19 IT IS HEREBY JOINTLY STIPULATED AND AGREED, by and between the  
20 Parties through their respective counsel of record that:

21 1. The Parties agree that this Court enter an Order to continue to stay all  
22 current and pending discovery in this case for sixty days from June 2, 2024 until August  
23 1, 2024;

24 2. The Parties agree that this Court enter an Order stating that all current and  
25 pending discovery deadlines be continued by sixty days; and  
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1           3.     The Parties agree that this Court enter an Order extending Plaintiff's  
2 deadline to file a motion for class certification by sixty days, from December 30, 2024  
3 to February 28, 2025.

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5 **IT IS SO STIPULATED.**

6 Dated:       June 3, 2024

SCHNEIDER WALLACE COTTRELL  
KONECKY LLP

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8 By: /s/ Carolyn H. Cottrell (as authorized on 6/3/24)

9 Carolyn H. Cottrell  
10 Ori Edelstein  
11 *Attorneys for Plaintiff*  
TIFFENY NANCE

12 Dated:       June 3, 2024

REED SMITH LLP

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14 By: /s/ Tanner J. Hendershot

15 Mara D. Curtis  
16 Rafael N. Tumanyan  
17 Tanner J. Hendershot  
18 *Attorneys for Defendants*  
19 RYDER INTEGRATED LOGISTICS, INC.  
20 and RYDER SYSTEM, INC.

1 **ORDER**

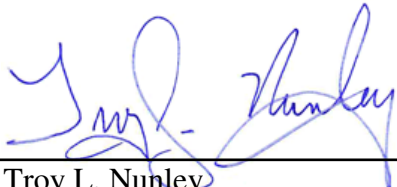
2 Pursuant to the above Stipulation, and good cause appearing, **IT IS SO**  
3 **ORDERED** as follows:

4 1. All current and pending discovery in this case is stayed for sixty days from  
5 June 2, 2024 until August 1, 2024.

6 2. All current and pending discovery deadlines in this case are continued by  
7 sixty days.

8 3. Plaintiff's deadline to file a motion for class certification is extended by  
9 sixty days from December 30, 2024, to February 28, 2025.

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11 Dated: June 3, 2024

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14 Troy L. Nunley  
15 United States District Judge

