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15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA  
 17 SAN FRANCISCO DIVISION

19 **NATTO IYELA GBARABE et al.,**

20 **Plaintiff,**

21 **v.**

22 **CHEVRON CORPORATION,**

23 **Defendant.**

**Case No. 14-cv-00173-SI**

**JOINT ~~PROPOSED~~ CASE  
 MANAGEMENT ORDER**

Date: June 2, 2016  
 Time: 3:00 p.m.  
 Judge: Hon. Susan Illston  
 Courtroom: 1

1           The parties have submitted their respective positions on the production of plaintiff's  
2 funding agreement and the Court will take it under submission.

3           The parties have stipulated and the Court orders:

4           1.       Plaintiff will complete electronic production of the Damage/Loss Questionnaires  
5 by May 31, 2016 and will not rely in class certification on any Damage/Loss surveys  
6 produced thereafter, absent a showing of good cause for later production and/or lack of  
7 prejudice to defendant. If a dispute arises that the parties cannot resolve informally, the  
8 issue will be submitted to this Court for determination. Plaintiff will also produce the  
9 names of the individuals who collected the Damage/Loss Questionnaires no later than  
10 May 31, 2016.

11          2.       Plaintiff will produce all facts and data, and any other production required by the  
12 March 7 stipulated order (Dkt. No. 120) by May 31, 2016. Plaintiff will certify that his  
13 production of facts and data is complete as of that date. To the extent that facts and data  
14 are not produced by that date, defendant reserves the right to move to exclude any  
15 opinions that rely on unproduced facts and data. Plaintiff reserves the right to argue his  
16 position that all necessary "facts and data" have been provided by that date or are outside  
17 the scope of Rule 26(a)(2)(B)(ii). In the event there is a dispute as to the completeness of  
18 the materials produced by plaintiff, the parties agree to submit the issues for determination  
19 to this Court.

20          3.       Plaintiff will re-produce his prior document productions with Bates numbers by  
21 June 16, 2016. The parties agree to meet and confer over any logistical issue which  
22 makes said date untenable.

23          4.       Plaintiff will file a "Certification of Interested Entities and Persons" pursuant to  
24 Local Rule 3-15 by May 31, 2016.

25          5.       The dates for class certification shall be re-set as follows:

26               Class Certification Opposition Brief: September 2, 2016

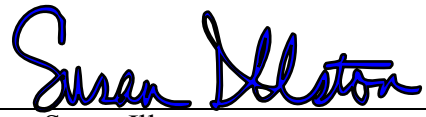
27               Class Certification Reply Brief: November 4, 2016; and

28               Hearing: December 9, 2019.

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**IT IS SO ORDERED.**

Dated: June 2, 2016

  
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Hon. Susan Illston  
United States District Judge

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