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 Allied Pilots Association

12 *Admitted pro hac vice
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 16 **UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

17
 18 AMERICAN AIRLINES FLOW-THRU
 PILOTS COALITION, et al.,

19 *Plaintiffs,*

20 v.

21 ALLIED PILOTS ASSOCIATION, et al.,

22
 23 *Defendants.*

Case No.: 3:15-cv-03125-RS

**STIPULATION REGARDING BRIEFING
 SCHEDULE, EXPERT DISCOVERY, AND
 STATUS CONFERENCE; ORDER
 AS MODIFIED BY THE COURT**

24
 25 The undersigned parties hereby stipulate, and respectfully request the Court to order as
 26 follows: (1) Defendant’s brief on causation, as ordered in the Court’s Order for Additional
 27 Briefing (ECF No. 229), shall be due on December 23, 2020, and Plaintiffs’ response shall be due
 28

1 on January 27, 2021; (2) discovery as to the November 20, 2019, revised expert report of Artemas
2 Darby, as ordered in the Court's Order re Pending Motions and Case Status (ECF No. 222), shall
3 be stayed pending the disposition of the causation issue currently before the Court; and (3) the
4 status conference currently scheduled for January 14, 2021 (ECF No. 222), shall be postponed
5 until the conclusion of briefing on the causation issue. Good cause for such scheduling
6 modifications exists for the following reasons:

7 The Court's recent order on causation (ECF No. 229) instructed the parties to confer to the
8 extent that the scheduled established by the Court was inconvenient to either or both sides. The
9 parties have done so. In light of the upcoming holidays, the parties believe that the proposed
10 deadlines set forth above represent a reasonable briefing schedule.

11 As to discovery on Mr. Darby's revised report, the current schedule calls for that discovery
12 to conclude on March 15, 2021 (ECF No. 224). The parties believe it would be most efficient to
13 await the resolution of those issues before proceeding with a deposition of Mr. Darby on his
14 revised report, the possible preparation of a rebuttal report, and the possible deposition of a
15 rebuttal expert.

16 Finally, as to the status conference currently scheduled for January 14, 2021, the parties
17 believe that it may be most productive to hold the conference after the Court has had an
18 opportunity to review the briefs submitted by the parties on causation.

19 The foregoing is so stipulated and agreed between the parties by and through their
20 undersigned counsel.

21 Dated: November 30, 2020

Respectfully submitted,

22 STEVEN K. HOFFMAN
23 DANIEL M. ROSENTHAL
24 ALICE C. HWANG
James & Hoffman, P.C.

25 JEFFREY B. DEMAIN
26 HUNTER B. THOMSON
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27 By: /s/ Jeffrey B. Demain
Jeffrey B. Demain

28 Attorneys for Defendant Allied Pilots Association

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By: /s/Timothy D. McGonigle
Timothy D. McGonigle

Attorneys for Plaintiffs

Signature Attestation

Pursuant to Local Civil Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: November 30, 2020

Altshuler Berzon LLP

By: /s/ Jeffrey B. Demain
Jeffrey B. Demain

ORDER

1 Based on the foregoing stipulation of counsel, and GOOD CAUSE appearing to do so, the
2 Court hereby makes the following Order:

3 Defendant's brief on causation, as ordered in the Court's Order for Additional Briefing
4 (ECF No. 229), shall be due on December 23, 2020, and Plaintiffs' response shall be due on
5 January 27, 2021;

6 Discovery as to the November 20, 2019, revised expert report of Artemas Darby, as
7 ordered in the Court's Order re Pending Motions and Case Status (ECF No. 222), shall be stayed
8 pending the disposition of the causation issue currently before the Court; and

9 **The status conference currently scheduled for January 14, 2021 (ECF No. 222), shall**
10 **be continued to February 18, 2021 at 1:30 pm.**

11
12 Dated: 11/30/2020



13
14 United States District Court Judge