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13 *Attorneys for Lead Plaintiffs Robert Wolfson and Frank*
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14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**

16 ROBERT CRAGO, Individually And On Behalf
 17 Of All Others Similarly Situated,

18 Plaintiff,

19 v.

20 CHARLES SCHWAB & CO., INC., and THE
 21 CHARLES SCHWAB CORPORATION,

22 Defendants.
 23

Case No. 3:16-cv-3938-RS

CLASS ACTION

**JOINT STIPULATION AND [~~PROPOSED~~]
 ORDER FOR EXTENSION OF CLASS
 CERTIFICATION SCHEDULE**

1 Pursuant to Local Rule 6-2, Lead Plaintiffs Robert Wolfson and Frank Pino and named
2 plaintiff Scott Posson (“Plaintiffs”), and Defendants Charles Schwab & Co., Inc. and The Charles
3 Schwab Corporation (“Defendants” or “Schwab” and, together with Plaintiffs, the “Parties”), by and
4 through their respective counsel, for good cause, hereby stipulate as follows:

5 WHEREAS, on June 21, 2018, the Court entered a Case Management Scheduling Order
6 setting the case schedule through the class certification hearing (ECF No. 136);

7 WHEREAS, the Parties have engaged in class certification and merits discovery and are
8 continuing to meet and confer in good faith regarding outstanding issues;

9 WHEREAS, in connection with class certification discovery, Plaintiffs seek from third-party
10 UBS Securities, LLC (“UBS”) the production of additional data regarding trade orders that Schwab
11 routed to UBS during the Class Period;

12 WHEREAS, Plaintiffs have met and conferred with UBS on multiple occasions regarding
13 the scope of the order data production, a negotiation that Plaintiffs believe has presented several
14 complex and novel issues;

15 WHEREAS, Plaintiffs are hopeful that they will be able to reach an agreement with UBS,
16 but need an extension of the current class certification deadlines to allow them to obtain the trade
17 order data;

18 WHEREAS, at Plaintiffs’ request, Defendants have agreed, with the Court’s approval, to
19 modify the Case Management Scheduling Order to extend the deadlines through the class
20 certification hearing;

21 WHEREAS, this is the Parties first request for an extension of the deadlines in the Case
22 Management Scheduling Order;

23 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO
24 APPROVAL BY THIS COURT, as follows:

25 The deadlines through the class certification hearing shall be as follows:
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27
28

Event	Deadline
Pre-class certification fact depositions	March 29, 2019
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	April 15, 2019
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	July 1, 2019
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	August 16, 2019
Expert depositions concerning class certification	September 3 - 13, 2019
Plaintiffs' class certification motion and <i>Daubert</i> challenges	October 4, 2019
Defendants' class certification opposition, <i>Daubert</i> challenges, and <i>Daubert</i> opposition	December 4, 2019
Plaintiffs' reply brief, opposition to <i>Daubert</i> challenges, and reply to <i>Daubert</i> challenges of Defendants' expert(s)	December 20, 2019
Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	January 13, 2020
Class Certification Hearing	TBD (as soon as practicable on a date convenient to the Court) January 30, 2020 at 1:30 pm.

IT IS SO STIPULATED.

Dated: December 12, 2018

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Dated: December 12, 2018

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ATTESTATION

I, Joshua L. Crowell, am the ECF User whose identification and password are being used to file this Joint Stipulation and [Proposed] Order for Extension of Class Certification Schedule. In compliance with Local Rule 5-1(i)(3), I hereby attest that Counsel for Defendants concur in this filing.

DATED: December 12, 2018

Joshua L. Crowell
Joshua L. Crowell

~~[PROPOSED]~~ ORDER

Based on the Parties' stipulation and the good cause described therein, the Court GRANTS this stipulation. The following schedule shall apply:

Event	Deadline
Pre-class certification fact depositions	March 29, 2019
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	April 15, 2019
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	July 1, 2019
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Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	January 13, 2020
Class Certification Hearing	TBD (as soon as practicable on a date convenient to the Court) January 30, 2020 at 1:30 pm

IT IS SO ORDERED.

DATED: 12/13/18



Hon. Richard Seeborg
U.S. District Court Judge