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13 *ADDITIONAL COUNSEL ON SIGNATURE BLOCK*

14 *Attorneys for Lead Plaintiffs and Co-Lead Counsel for the Class*

16 **UNITED STATES DISTRICT COURT**

17 **NORTHERN DISTRICT OF CALIFORNIA**

18 ROBERT CRAGO, Individually And On Behalf
 19 Of All Others Similarly Situated,

20 Plaintiff,

21 v.

22 CHARLES SCHWAB & CO., INC., and THE
 23 CHARLES SCHWAB CORPORATION,

24 Defendants.

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

25 CLASS ACTION

26 **JOINT STIPULATION AND
27 ORDER FOR EXTENSION OF CLASS
28 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 April 15, 2019, the Court entered a Case Management Scheduling Order
6 setting the case schedule through the class certification hearing (ECF No. 144), and on November 5,
7 2020 the Court so-ordered the Parties’ stipulation to extend the case schedule (ECF No. 156).

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

10 WHEREAS, pre-class certification fact depositions have been completed;

11 WHEREAS, Plaintiffs produced expert disclosures and a report concerning class
12 certification on September 1, 2020;

13 WHEREAS, Defendants produced expert disclosures and a report concerning class
14 certification on December 7, 2020;

15 WHEREAS, Plaintiffs require additional time to review and respond to the complete set of
16 Defendants’ expert disclosures due to a family medical emergency that will prevent Plaintiffs’
17 expert from completing his rebuttal report on time;

18 WHEREAS, to accommodate Plaintiffs’ scheduling request, Defendants require an
19 extension of subsequent deadlines in light of other scheduling conflicts;

20 WHEREAS, the Parties have agreed, with the Court’s approval, to modify the Case
21 Management Scheduling Order to extend the deadlines by approximately forty to sixty days through
22 the class certification hearing;

23 WHEREAS, this is the Parties’ seventh request for an extension of the deadlines in the Case
24 Management Scheduling Order;

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

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

Event	Deadline
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	March 12, 2021
Expert depositions concerning class certification	April 6-15, 2021
Plaintiffs' class certification motion and <i>Daubert</i> challenges	April 30, 2021
Defendants' class certification opposition, <i>Daubert</i> challenges, and <i>Daubert</i> opposition	June 30, 2021
Plaintiffs' reply brief, opposition to <i>Daubert</i> challenges, and reply to <i>Daubert</i> challenges of Defendants' expert(s)	July 19, 2021
Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	August 16, 2021
Class Certification Hearing	On or after September 20, 2021 at a date and time convenient to the Court

IT IS SO STIPULATED.

Dated: January 25, 2021

GLANCY PRONGAY & MURRAY LLP

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Attorneys for Plaintiff Scott Posson

1 Dated: January 25, 2021

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Attorneys for Defendants

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ATTESTATION

I, Jonathan Rotter, am the ECF User whose identification and password are being used to file this 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: January 25, 2021

Jonathan Rotter
Jonathan Rotter

ORDER

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

Event	Deadline
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	March 12, 2021
Expert depositions concerning class certification	April 6-15, 2021
Plaintiffs' class certification motion and <i>Daubert</i> challenges	April 30, 2021
Defendants' class certification opposition, <i>Daubert</i> challenges, and <i>Daubert</i> opposition	June 30, 2021
Plaintiffs' reply brief, opposition to <i>Daubert</i> challenges, and reply to <i>Daubert</i> challenges of Defendants' expert(s)	July 19, 2021
Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	August 16, 2021
Class Certification Hearing	September 23, 2021

IT IS SO ORDERED.

DATED: January 28, 2021

Hon. Richard Seeborg
U.S. District Court Judge