

1 Christopher A. Seeger, *Admitted Pro Hac Vice*
 Email: cseeger@seegerweiss.com
 2 SEEGER WEISS LLP
 55 Challenger Road, 6th Fl.
 3 Ridgefield Park, New Jersey 07660
 Telephone: (973) 639-9100
 4 Facsimile: (973) 679-8656

5 James E. Cecchi, *Admitted Pro Hac Vice*
 Email: jcecchi@carellabyrne.com
 6 CARELLA, BYRNE, CECCHI, OLSTEIN
 7 BRODY & AGENLLO, P.C.
 5 Becker Farm Road
 8 Roseland, New Jersey 07068
 Telephone: (973) 994-1700
 9 Facsimile: (973) 994-1744

Counsel for Plaintiffs and the Proposed Classes

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

14 LINDSAY and JEFF ABERIN (a married
 couple), DON AWTRY, CHARLES
 15 BURGESS, JOHN KELLY, YUN-FEI LOU,
 16 JOY MATZA, and MELISSA YEUNG,
 individually and on behalf of all others similarly
 17 situated,

Plaintiffs,

v.

20 AMERICAN HONDA MOTOR COMPANY,
 INC.,

Defendant.

No. 3:16-cv-04384-JST

STIPULATION AND ~~PROPOSED~~
 ORDER FOR AMENDED SCHEDULE OF
 PRETRIAL EVENTS THROUGH
 BRIEFING RELATED TO PLAINTIFFS'
 MOTION FOR CLASS CERTIFICATION

27 STIPULATION AND ~~PROPOSED~~ ORDER FOR AMENDED SCHEDULE OF
 PRETRIAL EVENTS THROUGH BRIEFING RELATED TO CLASS CERTIFICATION

1 Plaintiffs Lindsay and Jeff Aberin, Don Awtrey, Charles Burgess, John Kelly, Yun-Fei
2 Lou, Joy Matza and Melissa Yeung (collectively “Plaintiffs”) and Defendant American Honda
3 Motor Co., Inc. (“AHM”), by and through their respective counsel hereby propose the following
4 schedule to govern the litigation through to the completion of briefing related to Plaintiffs’
5 Motion for Class Certification.

6 Pleadings closed on May 28, 2018 when Defendant filed its Answer to Plaintiffs’ Third
7 Amended Class Action Complaint (ECF No. 149). This schedule extends the Schedule of
8 Pretrial Events approved by the Court on October 2, 2018 (ECF No. 172) by approximately 90
9 days, subject to adjustments for weekends and holidays. The parties further advise the Court that
10 the parties thus far have worked diligently, exchanging and responding to written discovery,
11 producing ESI and other documents, and inspecting all but one of Plaintiffs’ vehicles (where the
12 vehicle is still in his/her possession), with the final vehicle inspection expected to occur in
13 March. The parties have started to notice and schedule depositions and expect the production of
14 documents to be complete in the near term. The parties respectfully submit good cause exists to
15 grant this extension because fact discovery has taken longer than anticipated due to (among other
16 reasons) negotiations on certain ESI issues, some of which were briefed to Magistrate Ryu,
17 taking longer than anticipated. The parties will continue to work collaboratively to resolve all
18 remaining outstanding issues and to adhere to the schedule proposed below.

Event	Currently Scheduled Date	Proposed Date
Last Day to Serve Written Discovery	January 28, 2019	March 15, 2019
Close of Fact Discovery	February 28, 2019	May 31, 2019
Opening Expert Reports Due	--	June 14, 2019 (two weeks after close of fact discovery)
Rebuttal Reports Due	--	September 13, 2019 (91 days from opening report)

27 STIPULATION AND ~~PROPOSED~~ ORDER FOR AMENDED SCHEDULE OF
PRETRIAL EVENTS THROUGH BRIEFING RELATED TO CLASS CERTIFICATION

Event	Currently Scheduled Date	Proposed Date
Close of Expert Discovery	April 29, 2019	October 4, 2019 (21 days from rebuttal)
Motion for Class Certification	May 29, 2019	October 25, 2019 (21 days from close of expert discovery)
Class Cert. Opp.	July 15, 2019	December 6, 2019 (the week after the Thanksgiving holiday)
Class Cert. Reply	August 14, 2019	January 10, 2020

DATED: February 27, 2019

Respectfully Submitted,

KING & SPALDING LLP

SEEGER WEISS LLP

By: /s/ Livia M. Kiser
Livia M. Kiser (SBN 285411)
Email: lkiser@kslaw.com
KING & SPALDING LLP
444 West Lake Street, Suite 1650
Chicago, IL 60606
Tel: (312) 995-6333
Facsimile: 312 995 6330

By: /s/ Christopher A. Seeger
Christopher A. Seeger, *Admitted Pro Hac Vice*
Email: cseeger@seegerweiss.com
Stephen A. Weiss, *Admitted Pro Hac Vice*
Email: sweiss@seegerweiss.com
Scott Alan George, *Admitted Pro Hac Vice*
Email: sgeorge@seegerweiss.com
55 Challenger Road, 6th Fl.
Ridgefield Park, New Jersey 07660
Telephone: (973) 639-9100
Facsimile: (973) 679-8656

James E. Cecchi, *Admitted Pro Hac Vice*
Email: jcecchi@carellabyrne.com
CARELLA, BYRNE, CECCHI, OLSTEIN,
BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
Telephone: (973) 994-1700
Facsimile: (973) 994-1744


Counsel for Plaintiffs and the Proposed Classes

STIPULATION AND ~~PROPOSED~~ ORDER FOR AMENDED SCHEDULE OF PRETRIAL EVENTS THROUGH BRIEFING RELATED TO CLASS CERTIFICATION

~~PROPOSED~~ AMENDED ORDER

IT IS ORDERED that the Amended Schedule of Pretrial Events through Briefing Related to Plaintiffs' Motion for Class Certification, filed with the Court on February 27, 2019, is APPROVED.

DATED: February 28, 2019



TICAR, J.