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Attorneys for Plaintiffs (additional counsel appear on signature page)

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

MONTEVILLE SLOAN, JR., RAUL
 SIQUEIROS, TODD AND JILL CRALLEY,
 JOSEPH BRANNAN, LARRY GOODWIN,
 MARC PERKINS, DONALD LUDINGTON,
 THOMAS SHORTER, DERICK BRADFORD,
 GABRIEL DEL VALLE, KEVIN HANNEKEN,
 EDWIN AND KATELYN DOEPEL, DAN
 MADSON, JAMES FAULKNER, JOSEPH
 OLIVIER, SCOTT SMITH, ROSS DAHL,
 DREW PETERSON, MICHAEL WARE,
 STEVE KITCHEN, JOHN NEUBAUER,
 BARBARA MOLINA, DENNIS VITA,
 STEVEN EHRKE, BILL MAUCH, THOMAS
 GULLING, RONALD JONES, MIKE
 WARPINSKI, JOHN GRAZIANO, JOSHUA
 BYRGE, RUDY SANCHEZ, CHRISTOPHER
 THACKER, RANDY CLAUSEN, KELLY
 HARRIS, JAMES ROBERTSON, and JONAS
 BEDNAREK, individually and on behalf of all
 others similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**STIPULATION AND [~~PROPOSED~~] ORDER
 REGARDING MODIFICATION OF CASE
 SCHEDULE**

Judge: Hon. Edward J. Chen

1 WHEREAS the Court has set deadlines for the completion of fact discovery and class certification
2 motion practice (Dkt. No. 113);

3 WHEREAS the current deadline for the completion of fact discovery is November 16, 2018;

4 WHEREAS Plaintiffs served their first set of document requests on February 12, 2018 and GM
5 served timely written responses;

6 WHEREAS Defendant General Motors LLC (“GM”) produced its first batch of responsive
7 documents (5,800 pages) on July 21, 2018 and anticipates that rolling production of documents from the
8 current slate of custodians that are responsive to the requests Plaintiffs have served so far will continue
9 for approximately 60 days;

10 WHEREAS the Parties engaged in extensive correspondence and discussion to resolve various
11 discovery issues, including Plaintiffs’ request that GM search the files of ten additional custodians, in an
12 effort to avoid burdening Magistrate Judge Spero with the Parties’ disputes;

13 WHEREAS the Parties’ counsel conducted a July 17, 2018 videoconference to meet and confer
14 regarding, among other things, the custodians from whom GM intends to produce documents and a
15 timetable for GM’s document production;

16 WHEREAS GM has agreed to produce documents in the possession of the ten additional
17 custodians;

18 WHEREAS, given the anticipated volume of documents to be produced and the timing thereof,
19 Plaintiffs have indicated that they need additional time to review GM’s production and then conduct any
20 depositions and necessary follow-up discovery, including requests for admissions or additional document
21 requests, prior to the current fact discovery cut-off;

22 WHEREAS the Parties request the following adjustments to the current discovery and class
23 certification motion practice schedule;

24 THEREFORE, IT IS STIPULATED by Plaintiffs and GM, through their counsel of record,
25 subject to the approval of the Court, as follows:

- 26 1. The fact discovery cut-off and the deadline to file a motion to amend the pleadings are
27 extended from November 16, 2018 to **March 16, 2019**;

2. The deadline for Parties to substantially complete their document productions is extended from October 5, 2018 to **November 8, 2018**;
3. The deadline for Plaintiffs' Motion for Class Certification and Plaintiffs' Rule 26(a)(2) Class Certification Expert Disclosures/Reports is extended from December 20, 2018 to **April 18, 2019**;
4. The deadline for GM's Opposition to Motion for Class Certification and GM's Rule 26(a)(2) Class Certification Expert Disclosures/Reports is extended from March 15, 2019 to **July 18, 2019**;
5. The deadline for Plaintiffs' Reply in Support of Motion for Class Certification and Plaintiffs' Rebuttal Class Certification Expert Disclosures/Reports is extended from April 29, 2019 to **August 22, 2019**;
6. The date of the hearing on Motion for Class Certification is moved from May 16, 2019 to **September 19, 2019**; and (at 1:30 p.m.)
7. The deadline for the completion of private mediation is extended through **April 2019**, consistent with the extension of the discovery cut-off.

Dated: July 26, 2018

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Counsel for Plaintiffs and the Proposed Classes

ECF CERTIFICATION

Pursuant to Civil L.R. 5-1(i)(3), the filing attorney attests that she has obtained concurrence regarding the filing of this document from the signatories to the document.

Date: July 25, 2018

By: /s/ Jennie Lee Anderson
 Jennie Lee Anderson

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The 8/23/18 Further CMC is vacated. Next CMC remains set for 11/15/18 at 10:30 a.m. Updated joint CMC Statement due 11/8/18.

Dated this 13th day of August, 2018

