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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

TAMARA LOHR and RAVIKIRAN  
SINDOGI, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

vs.

NISSAN NORTH AMERICA, INC.

Defendant.

NO. 2:16-cv-01023-RSM

**STIPULATION AND ORDER TO  
FURTHER EXTEND CLASS  
CERTIFICATION DEADLINES**

Plaintiffs Tamara Lohr and Ravikiran Sindogi (“Plaintiffs”) and Defendant Nissan North America, Inc. (“NNA”) (collectively, the “Parties”) enter into this stipulation with reference to the following facts and recitals:

1. Between March and June, 2019, Parties attempted mediation before Hon. James L. Warren (Ret.) at JAMS in San Francisco. No resolution was reached.
2. The Parties are coordinating discovery and class certification deadlines in this action with a companion case filed in the Northern District of California, *Johnson, et al. v. Nissan N. Am., Inc.*, Case No. 3:17-cv-00517-WHO.
3. Due to the unsuccessful mediation efforts, the Parties need additional time to complete discovery in anticipation of class certification briefing and in anticipation of the preparation of expert reports.
4. As the result of significant consultation and coordination of their scheduling needs, the Parties have agreed to extend the deadlines in this

1 case and in *Johnson* to accommodate the delays from trying to mediate,  
2 both parties' need for additional discovery, and the necessity of addressing  
3 complex issues in both cases with the assistance of experts.

- 4 5. The Parties have coordinated with counsel in *Johnson* and are seeking  
5 entry of a similar scheduling order. If this Court and the *Johnson* court  
6 approve these requests, then the two cases will remain on parallel tracks if  
7 a resolution is not reached prior to class certification. An extension of the  
8 deadlines in this matter, as reflected below, may facilitate on-going  
9 informal settlement discussions, and will not be unduly prejudicial to  
10 either party.
- 11 6. Four other extensions of the class certification briefing schedule have been  
12 entered in this matter. ECF Nos. 62, 68, 70, and 73.
- 13 7. For the above reasons, the Parties stipulate to extend the deadlines in this  
14 matter as set forth below and respectfully request that the Court enter an  
15 order accordingly:

Event	Deadline	Proposed Deadline
Deadline to file Motion for Class Certification and serve Plaintiffs' expert disclosures and reports	November 19, 2019	June 19, 2020
Deadline for Plaintiffs to produce experts for deposition	December 31, 2019	July 30, 2020
Deadline to file opposition to Motion for Class Certification and serve NNA's expert disclosures and reports	February 10, 2020	October 9, 2020
Deadline for NNA to produce experts for deposition	February 28, 2020	November 13, 2020
Deadline to file reply regarding Motion for Class Certification	March 19, 2020	November 25, 2020
Class Certification Hearing	April 15, 2020	As set by Court

1 IT IS SO STIPULATED.

2 Respectfully submitted,

3  
4 Dated: September 26, 2019

5 By: /s/ Lisa A. White

6 Presented by and on Behalf of Plaintiffs

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8 Adam A. Edwards (*pro hac vice*)

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16 *Attorneys for Plaintiff*

17 Dated: September 26, 2019

18 By: /s/ Holly Pauling Smith  
19 Presented by and on Behalf of Defendant

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12 *Attorneys for Defendant*

13 **I. ORDER**

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 Dated this 30 day of September, 2019.

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18 RICARDO S. MARTINEZ  
19 CHIEF UNITED STATES DISTRICT JUDGE  
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