

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

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

NO. 2:16-cv-01023-RSM

Plaintiffs,

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

vs.

NISSAN NORTH AMERICA, INC.

Defendant.

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. Five other extensions of the class certification briefing schedule have been entered in this matter. ECF Nos. 62, 68, 70, 73, and 75.
2. Following the entry of the Court’s last extension, the Parties have been diligently undertaking discovery.
3. However, in light of the recent outbreak of the novel coronavirus (also called COVID-19) and the associated health risks, the Parties are unable to complete the discovery needed by both parties which includes both additional depositions and vehicle inspections that will require significant travel for lawyers as well as court reporters, videographers, witnesses and experts in time to meet the current deadlines related to class certification and expert witness disclosure.

4. 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.
5. The Western District of Washington has recognized the serious health risks associated with COVID-19 and has taken steps in response to its recent outbreak, including issuing General Order No. 02-20.
6. As the result of the outbreak of COVID-19, the Parties have agreed to extend the deadlines in this case and in *Johnson* to accommodate the delays in discovery necessary to ensure the safety and health of the Parties and their counsel.
7. The Parties have coordinated with counsel in *Johnson* and are seeking entry of a similar scheduling order. If this Court and the *Johnson* court approve these requests, then the two cases will remain on parallel tracks if a resolution is not reached prior to class certification. An extension of the deadlines in this matter, as reflected below, may facilitate on-going informal settlement discussions, and will not be unduly prejudicial to either party.
8. For the above reasons, the Parties stipulate to extend the deadlines in this matter as set forth below and respectfully request that the Court enter an order accordingly:

Event	Deadline	Proposed Deadline
Deadline to file Motion for Class Certification and serve Plaintiffs' expert disclosures and reports	June 19, 2020	September 17, 2020
Deadline for Plaintiffs to produce experts for deposition	July 30, 2020	October 28, 2020
Deadline to file opposition to Motion for Class Certification and serve NNA's expert disclosures and reports	October 9, 2020	January 14, 2021

1	Deadline for NNA to produce experts for deposition	November 13, 2020	February 18, 2021
2	Deadline to file reply regarding Motion for Class Certification	November 25, 2020	March 2, 2021
3	Class Certification Hearing	To be set by the Court	As set by the Court
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7 IT IS SO STIPULATED.

8 Respectfully submitted,

9 Dated: March 23, 2020

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11 By: /s/ Adam A. Edwards
12 On Behalf of Plaintiffs

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7 On Behalf of Defendant

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1 **I. ORDER**

2 PURSUANT TO STIPULATION, IT IS SO ORDERED.

3 Dated this 24 day of March 2020.

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5 RICARDO S. MARTINEZ
6 CHIEF UNITED STATES DISTRICT JUDGE

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