

1 Elizabeth J. Cabraser (State Bar No. 083151)
2 LIEFF CABRASER HEIMANN &
3 BERNSTEIN, LLP
4 275 Battery Street, 29th Floor
5 San Francisco, CA 94111-3339
6 Telephone: (415) 956-1000
7 Facsimile: (415) 956-1008
8 Email: ecabraser@lchb.com

9 *Plaintiffs' Lead Counsel*

Robert J. Giuffra, Jr.
William B. Monahan
Darrell S. Cafasso
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
Email: giuffrar@sullcrom.com
Email: monahanw@sullcrom.com
Email: cafassod@sullcrom.com

*Counsel for Fiat Chrysler Automobiles N.V.,
FCA US LLC, Sergio Marchionne, V.M.
Motori, S.p.A. and V.M. North America, Inc.*

Matthew Slater
CLEARY GOTTLIEB STEEN &
HAMILTON LLP
2000 Pennsylvania Ave., N.W.
Washington, DC 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1999
Email: mslater@cgsh.com

*Counsel for Robert Bosch LLC and Robert
Bosch GmbH*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19
20 IN RE CHRYSLER-DODGE-JEEP
21 ECODIESEL MARKETING, SALES
22 PRACTICES, AND PRODUCTS
23 LIABILITY LITIGATION

Case No. 3:17-md-02777-EMC

**STIPULATION AND [PROPOSED]
ORDER EXTENDING CLASS-
CERTIFICATION-RELATED
DEADLINES**

The Honorable Edward M. Chen

1 WHEREAS, Amended Pretrial Order No. 12: Stipulated Discovery Schedule
 2 (Dkt. No. 227) establishes certain deadlines for Defendants Fiat Chrysler Automobiles N.V., FCA
 3 US LLC, Sergio Marchionne, V.M. Motori S.p.A., and V.M. North America, Inc. (the "FCA
 4 Defendants"), Robert Bosch LLC and Robert Bosch GmbH (the "Bosch Defendants"), and the
 5 Plaintiffs' Steering Committee ("PSC") (collectively, the "Parties") to engage in discovery and
 6 motion practice in the above-captioned action, including a January 31, 2018 deadline for the
 7 substantial completion of productions of non-privileged, responsive documents related to class
 8 certification;

9 WHEREAS, the FCA Defendants and the PSC have produced a significant
 10 number of documents potentially related to class certification issues, have been meeting and
 11 conferring in good faith concerning additional class-certification-related discovery, and believe
 12 that a short extension of class-certification-related deadlines would allow for the timely and
 13 efficient completion of these productions;

14 WHEREAS, the PSC and the Bosch Defendants are discussing further productions
 15 and believe that a short extension of class-certification-related deadlines would allow for the
 16 timely and efficient completion of these productions; and

17 WHEREAS, the Parties do not propose any other changes to the current schedule
 18 as a result of the short extension requested and agreed herein.

19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
 20 among the Parties, and subject to the approval of the Court:

21 Deadlines related to class certification in Amended Pretrial Order No. 12 are
 22 adjusted as follows:

Prior Deadline	New Deadline	Event
January 31, 2018	March 2, 2018	The Class Plaintiffs and Defendants shall substantially complete their productions of non-privileged, responsive documents related to class certification.
March 1, 2018	April 2, 2018	Class Plaintiffs shall disclose experts on which they shall rely for their class certification motion.

1	March 15, 2018	April 16, 2018	Class Plaintiffs shall file their motion for class certification.
2	April 12, 2018	May 14, 2018	Defendants shall disclose experts on which they shall rely for their opposition to the class certification motion.
3			
4	April 26, 2018	May 29, 2018	Defendants shall file their brief(s) in opposition to the Class Plaintiffs' motion for class certification.
5			
6	May 24, 2018	June 25, 2018	Class Plaintiffs shall file a reply brief in support of its motion for class certification.
7	June 14, 2018	July 18, 2018 7/17/18 (or otherwise at the 10 am) *	Class certification hearing.
8			

9

10 **SO STIPULATED.**

11 Dated: January 31, 2018

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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14 By: /s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

15 Lieff Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
16 San Francisco, CA 94111-3339
Telephone: (415) 956-1000
17 Facsimile: (415) 956-1008
ecabraser@lchb.com

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19 *Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering Committee*

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Dated: January 31, 2018

SULLIVAN & CROMWELL LLP

By: /s/ Robert J. Giuffra, Jr.
Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.
William B. Monahan
Darrell S. Cafasso
Sullivan & Cromwell LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
giuffrar@sullcrom.com
monahanw@sullcrom.com
cafassod@sullcrom.com

*Counsel for Fiat Chrysler Automobiles N.V., FCA US LLC,
Sergio Marchionne, V.M. Motori, S.p.A., and V.M. North
America, Inc.*

Dated: January 31, 2018

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: /s/ Matthew D. Slater
Matthew D. Slater

Cleary Gottlieb Steen & Hamilton LLP
2000 Pennsylvania Ave., N.W.
Washington, DC 20006
Telephone: (202) 974-1500
Facsimile: (202) 974-1999
mslater@cgsh.com

Counsel for Robert Bosch LLC and Robert Bosch GmbH

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**[PROPOSED] ORDER EXTENDING
CLASS-CERTIFICATION-RELATED DEADLINES**

Based on the foregoing Stipulation, the Court GRANTS the Parties' Stipulation Extending
Class-Certification-Related Deadlines.

IT IS SO ORDERED.

DATED: 2/1, 2018.



Edward M. Chen
United States District Judge

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ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))

In accordance with Civil Local Rule 5-1(i)(3), I attest the concurrence in the filing of this document has been obtained from the signatories.

Dated: January 31, 2018

/s/ C. Megan Bradley
C. Megan Bradley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 31, 2018, a true and correct copy of the foregoing was electronically filed and served electronically via the Court's CM/ECF system, which will automatically serve notice to all registered counsel of record.

/s/ C. Megan Bradley
C. Megan Bradley