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

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

Case No. 3:17-md-02777-EMC  
ORDER - PRETRIAL ORDER NO. 19

**AGREED STIPULATION AND**  
**[PROPOSED] ORDER AMENDING**  
**CERTAIN DEADLINES**

The Honorable Edward M. Chen

1 WHEREAS, on March 15, 2018, the Court granted in part and denied in part  
2 Defendants' motions to dismiss the Class Plaintiffs' Amended Consolidated Consumer Class  
3 Action Complaint, and granted leave to amend certain of their claims (ECF No. 290);

4 WHEREAS, the Class Plaintiffs intend to amend certain of their claims, and  
5 Defendants may move to dismiss some or all of the claims;

6 WHEREAS, Class Plaintiffs and Defendants previously raised a dispute in the  
7 April 3, 2018 Joint Case Management Conference Statement (ECF No. 292) concerning the  
8 scheduling of class certification depositions, the schedule for class certification briefing, and  
9 Class Plaintiffs' request to bifurcate class certification briefing;

10 WHEREAS, the Parties have met and conferred and resolved the dispute in an  
11 attempt to avoid any undue delay in these proceedings, such that, subject to Court approval, Class  
12 Plaintiffs will file their amended complaint and then move for class certification on all claims  
13 asserted in the amended complaint during the pendency of Defendants' anticipated motion to  
14 dismiss claims in the amended complaint; and

15 WHEREAS, the agreed-upon schedule sets forth a briefing schedule for  
16 Defendants' motion to dismiss Class Plaintiffs' amended complaint and a revised schedule for  
17 briefing class certification of all claims.

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

20 The following deadlines are hereby established regarding the Class Plaintiffs'  
21 amended complaint and Defendants' anticipated motion to dismiss:

Date	Event
April 23, 2018	The Class Plaintiffs shall file the Second Amended Consolidated Consumer Class Action Complaint ("SAC").
May 23, 2018	Defendants shall answer, move to dismiss, or otherwise respond to the SAC.
June 22, 2018	Plaintiffs shall file any response in opposition to any motion to dismiss made by Defendants.
July 13, 2018	Defendants will file any reply(ies) in support of their motions to dismiss.

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3 Class Plaintiffs shall move for class certification of all claims in the SAC, and the  
4 following deadlines are hereby revised in that regard:

Prior Deadline	New Deadline	Event
April 16, 2018	June 6, 2018	Class Plaintiffs shall file their motion for class certification of all claims in the SAC. All remaining class-certification depositions of Defendants will be completed sufficiently in advance of this deadline.
May 14, 2018	June 22, 2018	Defendants shall disclose experts on which they shall rely for their opposition to the class certification motion.
May 29, 2018	July 23, 2018	Defendants shall file their brief(s) in opposition to the Class Plaintiffs' motion for class certification. All remaining class-certification depositions of Class Representatives will be completed sufficiently in advance of this deadline.
June 25, 2018	August 20, 2018	Class Plaintiffs shall file a reply brief in support of their motion for class certification.

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15 Sept. 17, 2018(2:15 p.m.)-Hearing on motion for class certification

16 **SO STIPULATED.**

17 Dated: April 7, 2018

17 Respectfully submitted,

18 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

19 By: /s/ Elizabeth J. Cabraser  
20 Elizabeth J. Cabraser

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27 *Plaintiffs' Lead Counsel and Chair of the Plaintiffs' Steering*  
28 *Committee*

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Dated: April 7, 2018

SULLIVAN & CROMWELL LLP

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Dated: April 7, 2018

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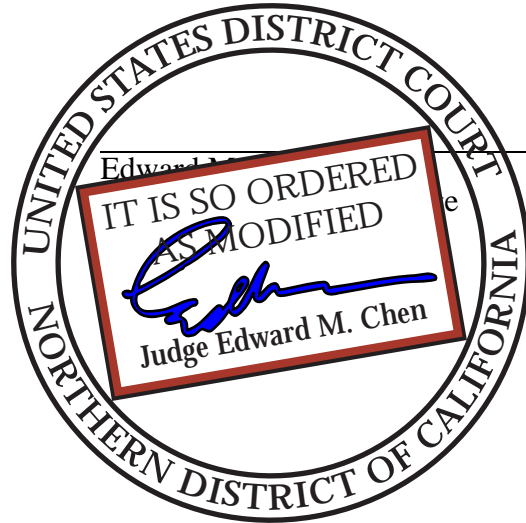
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**[PROPOSED] ORDER**  
**AMENDING CERTAIN DEADLINES**

Based on the foregoing Stipulation, the Court GRANTS the Parties' Agreed Stipulation Amending Certain Deadlines.

IT IS SO ORDERED.

DATED: 4/11, 2018.



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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: April 7, 2018

/s/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 7, 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/ Elizabeth J. Cabraser  
Elizabeth J. Cabraser