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

IN RE CHRYSLER-DODGE-JEEP
ECODIESEL MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

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

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

The Honorable Edward M. Chen

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

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

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

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

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

Deadlines related to class certification in Amended Pretrial Order No. 12 are 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		Court's convenience)	

SO STIPULATED.

Dated: January 31, 2018

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

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

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

1 Dated: January 31, 2018

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11 Dated: January 31, 2018

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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

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

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