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23 UNITED STATES DISTRICT COURT
 24 NORTHERN DISTRICT OF CALIFORNIA
 25 SAN FRANCISCO DIVISION

26 IN RE TESLA, INC. SECURITIES
 27 LITIGATION

Case No. 3:18-cv-04865-EMC

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME AND [PROPOSED] ORDER**

28 Pursuant to Civil Local Rule 6-2, Lead Plaintiff Glen Littleton (“Lead Plaintiff”) and Defendants Tesla, Inc., Elon R. Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (collectively, “Defendants”) (collectively, Lead Plaintiff and Defendants are referred to as the “Parties”), by and through their undersigned counsel of record, submit the following stipulation and proposed order:

1 WHEREAS, on May 22, 2020, the Parties filed a Joint Case Management Statement and
2 Proposed Order proposing litigation deadlines for this case (Dkt. No. 256);

3 WHEREAS, on May 31, 2020, the Court entered a Case Management and Pretrial Order for
4 Jury Trial setting the litigation deadlines for this case (Dkt. No. 261);

5 WHEREAS, because substantial discovery still remains to be completed, counsel for
6 Defendants and counsel for Lead Plaintiff have conferred regarding extending certain litigation
7 deadlines for this case;

8 WHEREAS, the Parties agreed to modify certain deadlines for this case while maintaining the
9 previously scheduled dates for the Final Pretrial Conference and Trial;

10 NOW, THEREFORE, the Parties hereby jointly request that the Court enter an order
11 establishing the following deadlines in this case:

Event	Current Schedule	Proposed Modified Schedule
Non-Expert Discovery Cut-Off	June 15, 2021	September 28, 2021
Opening Expert Reports	July 14, 2021	October 12, 2021
Rebuttal Expert Reports	August 25, 2021	November 16, 2021
Expert Discovery Cut-Off	September 15, 2021	December 3, 2021
Dispositive Motions	October 15, 2021	December 16, 2021
Opposition to Dispositive Motions	November 23, 2021	January 17, 2022
Reply in Further Support of Dispositive Motions	December 23, 2021	February 7, 2022
Hearing on Dispositive Motions	January 20, 2022	March 3, 2022
Final Pretrial Conference	May 3, 2022	May 3, 2022
Trial	May 31, 2022	May 31, 2022

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Dated: May 3, 2021

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By: /s/ Patrick E. Gibbs
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Dated: May 3, 2021

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ATTESTATION OF SIGNATURES

Pursuant to Civil Local Rule No. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: May 3, 2021

COOLEY LLP

By: /s/ Patrick E. Gibbs

Patrick E. Gibbs

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IT IS SO ORDERED.

Date: _____

The Honorable Edward M. Chen
UNITED STATES DISTRICT JUDGE