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10 Attorneys for Plaintiff LINDA DE SANTOS
11 and all others similarly situated

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 LINDA DE SANTOS an individual, on
15 behalf of herself and all others
16 similarly situated,

17 Plaintiff,

18 vs.

19 ACO OIL COMPANY, a California
20 corporation; and DOES 1 through 100,
21 inclusive,

22 Defendants.

CASE NO. 1:14-CV-00738-JLT

Assigned to Hon. Jennifer L. Thurston

**JOINT STIPULATION TO
CONTINUE THE PLEADING
AMENDMENT DEADLINE;
ORDER;
DECLARATION OF SHANE C.
STAFFORD IN SUPPORT
THEREOF**

(Doc. 15)

1 Plaintiff, LINDA DE SANTOS and Defendant JACO OIL COMPANY
2 (“JACO”), by and through their attorneys of record, hereby stipulate as follows:

3 **Whereas**, Plaintiff has filed a class action based on Defendant JACO’s
4 alleged violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.*
5 (“FCRA”), and the Investigative Consumer Reporting Agencies Act, California
6 Civil Code § 1786, *et seq.* (“ICRAA”);

7 **Whereas**, the Court issued its Amended Scheduling Order on August 27,
8 2014, ordering that all pleading amendments be filed no later than February 13,
9 2015;

10 **Whereas**, on October 28, 2014, Plaintiff propounded Special Interrogatories
11 and Requests for Production of Documents on Defendant JACO to investigate her
12 claims regarding Defendant’s unlawful practices;

13 **Whereas**, Defendant JACO’s responses to Plaintiff’s discovery were due on
14 or before December 1, 2014;

15 **Whereas**, the parties agreed to a 30-day extension of time for Defendant
16 JACO to respond to Plaintiff’s discovery, which will now be due on or before
17 December 31, 2014;

18 **Whereas**, the parties further agreed to a 60-day extension of time for the
19 parties to file pleading amendments, from February 13, 2015 to April 13, 2015, in
20 the event Plaintiff uncovers additional entities that should be named as defendants
21 in this matter.

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1 **IT IS THEREFORE STIPULATED THAT** the cutoff for the parties to
2 file pleading amendments be continued 60-days from February 13, 2015 to April
3 13, 2015.

4
5 DATED: November 25, 2014 SHANBERG STAFFORD & BARTZ LLP

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8 By: /s/ Shane C. Stafford
9 SHANE C. STAFFORD
10 ROSS E. SHANBERG
11 AARON A. BARTZ
12 Attorneys for Plaintiff
13 LINDA DE SANTOS,
14 and all others similarly situated

15 DATED: November 25, 2014 KLEIN, DENATALE, GOLDNER,
16 COOPER, ROSENLIEB & KIMBALL LLP

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19 By: /s/ Connie M. Parker
20 David J. Cooper
21 Connie M. Parker
22 Attorneys for Defendant
23 JACO OIL COMPANY
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ORDER

Pursuant to the Stipulation of the parties, and for good cause shown, the Court **ORDERS**:

1. The scheduling order (Doc. 12) is amended to extend the pleading amendment deadline to **April 13, 2015**;

2. No other amendments, including the deadline to complete discovery, are authorized.

IT IS SO ORDERED.

Dated: November 25, 2014

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE