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

22 Defendants.

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

**JOINT STIPULATION FOR  
PLAINTIFF TO FILE FIRST  
AMENDED COMPLAINT AND  
FOR DEFENDANT TO FILE AN  
ANSWER TO FIRST AMENDED  
COMPLAINT; [PROPOSED]  
ORDER**

(Doc. 23)

1 Plaintiff, LINDA DE SANTOS and Defendant JACO OIL COMPANY  
2 (“JACO”), by and through their attorneys of record, hereby stipulate as follows:  
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4 **Whereas**, Plaintiff filed a class action on May 16, 2014, based on  
5 Defendant JACO’s alleged violations of the Fair Credit Reporting Act, 15 U.S.C.  
6 § 1681, *et seq.* (“FCRA”), and the Investigative Consumer Reporting Agencies  
7 Act, California Civil Code § 1786, *et seq.* (“ICRAA”);  
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9 **Whereas**, the parties hereby stipulate, by and between their respective  
10 attorneys of record, that Plaintiff may file a First Amended Complaint, a copy of  
11 which is attached hereto as Exhibit “A.”  
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13 It is further stipulated that the First Amended Complaint shall be deemed  
14 filed as of the date this Stipulation is approved by the Court, and that Defendants  
15 will be deemed to have been served on the same date.  
16

17 **Whereas**, the parties further stipulate, by and between their respective  
18 attorneys of record, that JACO, along with the additional defendants named in the  
19 First Amended Complaint, may file an Answer to First Amended Complaint, a  
20 copy of which is attached hereto as Exhibit “B.”  
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1 It is further stipulated that the Answer to First Amended Complaint shall be  
2 deemed filed as of the date this Stipulation is approved by the Court, and that  
3 Plaintiff will be deemed to have been served on the same date.  
4

5  
6 DATED: April 7, 2015 SHANBERG STAFFORD & BARTZ LLP

7  
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: April 7, 2015 KLEIN, DENATALE, GOLDNER,  
16 COOPER, ROSENLIEB & KIMBALL LLP

17  
18 By: /s/ Connie M. Parker  
19 David J. Cooper  
20 Connie M. Parker  
21 Attorneys for Defendant  
22 JACO OIL COMPANY  
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**[PROPOSED] ORDER**

Based upon the stipulation of the parties, the Court **ORDERS:**

1. Plaintiff's may file her First Amended Complaint within two court days;
2. Defendants' Answer to the First Amended Complaint shall be filed no later than five court days thereafter.

IT IS SO ORDERED.

Dated: April 8, 2015

/s/ Jennifer L. Thurston  
UNITED STATES MAGISTRATE JUDGE