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10 Attorneys for Defendants  
 11 VERIZON COMMUNICATIONS, INC. and  
 12 VERIZON CORPORATE RESOURCES  
 13 GROUP LLC (erroneously named as  
 14 VERIZON CORPORATION RESOURCES  
 15 GROUP, LLC)

16 UNITED STATES DISTRICT COURT  
 17 EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

18 Dave Meza, an individual, on behalf of  
 19 himself and all other similarly situated,

20 Plaintiff,

21 v.

22 Verizon Communications, Inc., a  
 23 Delaware corporation; Verizon  
 24 California, Inc., a California  
 25 corporation; Frontier Communications  
 26 Corporation; Verizon Corporation  
 27 Resources Group, LLC; and DOES 3  
 28 through 10,

Defendants.

**Case No. 1:16-cv-00739-AWI-MJS**

**Assigned for all purposes to  
 Judge Anthony W. Ishii**

**JOINT STIPULATION AND  
 ORDER AMENDING MOTION  
 SCHEDULE**

Complaint filed: April 14, 2016

1 Plaintiff Dave Meza (“Plaintiff”), on the one hand, and defendants Frontier  
2 California Inc. and Frontier Communications Corporation (collectively,  
3 “Frontier”), and defendants Verizon Communications, Inc. and Verizon Corporate  
4 Resources Group LLC (collectively, “Verizon”) (Frontier and Verizon are referred  
5 to collectively as “Defendants”), on the other hand, hereby enter into the following  
6 Stipulation with reference to the following facts:

7 **RECITALS**

8 1. On April 14, 2016, Plaintiff filed his Complaint in Fresno County Superior  
9 Court, alleging a single claim for relief under the Fair Credit Reporting Act, 15  
10 U.S.C. § 1681b.

11 2. On May 27, 2016, Frontier timely removed the action to this Court based on  
12 federal question jurisdiction.

13 3. On September 28, 2016, Defendants filed their respective Answers to the  
14 Complaint, denying the allegations in the Complaint.

15 4. On November 9, 2016, counsel for the parties appeared before the Court at a  
16 Scheduling Conference, after which the Court set the following deadlines related to  
17 any motions for summary judgment and class certification:

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19 May 30, 2017	Last Day to file Motion for Summary Judgment
20	
21 Four weeks after ruling on any summary judgment motion, or June 27, 2017, if no such motion is filed	Last Day to file Motion for Class Certification
22	
23	
24 July 17, 2017 (1:30 pm)	Last Day to hear Motion for Summary Judgment
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26 (Docket No. 22, at 3).

27 5. Since the Scheduling Conference, the parties have been actively engaged in  
28 discovery. They have exchanged their initial disclosures, propounded and

1 responded to several sets of interrogatories and document demands, and produced  
2 relevant and responsive documents.

3 6. The parties followed the Court’s Order for all counsel “to discuss with their  
4 clients the relative benefits and detriments of settlement versus trial, the likelihood  
5 the case ultimately will settle and the economic benefit of settling sooner rather  
6 than later.” (Id., at 4). Having done so, and after conducting the necessary  
7 discovery discussed above, the parties believe they are now in a position to have  
8 fruitful discussions regarding a possible resolution.

9 7. In an effort to give settlement a realistic chance, the parties agree that  
10 amending the motion schedule above is necessary. Doing so will help the parties  
11 avoid unnecessary discovery and litigation expenses due to looming summary  
12 judgment and class certification deadlines. It will also serve judicial economy  
13 since the parties will not need to file or burden the Court with unnecessary  
14 discovery and/or dispositive motions.

15 **STIPULATION**

16 Based on the facts stated above and subject to this Court’s approval, plaintiff  
17 Meza and defendants Frontier and Verizon stipulate that the motion schedule  
18 outlined in the Scheduling Order issued on November 10, 2016 in this action be  
19 amended to apply the following dates:  
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22 August 31, 2017	Last Day to file Motion for Summary Judgment
23 Four weeks after ruling on any summary judgment motion, or September 28, 2017, if no such motion is filed	Last Day to file Motion for Class Certification
24 September 18, 2017 (1:30 pm)	Last Day to hear Motion for Summary Judgment

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28 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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Dated: March 22, 2017

DION-KINDEM LAW FIRM

By: /s/ Peter R. Dion-Kindem  
Peter R. Dion-Kindem, P.C.

Peter R. Dion-Kindem  
Attorneys for Plaintiff DAVE MEZA

Dated: March 22, 2017

JONES DAY

By: /s/ Steven M. Zadravec  
Steven M. Zadravec

Attorneys for Defendants VERIZON  
COMMUNICATIONS, INC. AND  
VERIZON CORPORATE  
RESOURCES GROUP LLC  
(erroneously named as VERIZON  
CORPORATION RESOURCES  
GROUP, LLC)

Dated: March 22, 2017

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Joseph V. Marra III  
Joseph V. Marra III

Attorneys for Defendants FRONTIER  
CALIFORNIA INC. and FRONTIER  
COMMUNICATIONS CORP.

**ORDER**

Good cause appearing, the foregoing Stipulation to amend motion  
schedule is accepted and adopted as the Order of this Court.

IT IS SO ORDERED.

Dated: March 23, 2017

/s/ Michael J. Seng  
UNITED STATES MAGISTRATE JUDGE