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 CHASE BANK USA, N.A.

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 8 **UNITED STATES DISTRICT COURT**
 9 **EASTERN DISTRICT OF CALIFORNIA**
 10 **SACRAMENTO DIVISION**

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 12 RONALD L. LOSEL, an individual, on behalf)
 of himself and a class of similarly-situated)
 13 consumers,)
)
 14 Plaintiff,)
)
 15 vs.)
)
 16 CHASE BANK USA, N.A., a Delaware)
 corporation; DONALD M. PALMER, D.C., an)
 17 individual and doing business as California)
 18 Spine and Disc Pain Center; and DOES 1)
 through 50, inclusive,)
 19)
 Defendants.)

Case No. 2:11-cv-01999-KJM-DAD
 [Assigned to the Hon. Kimberly J. Mueller]
**STIPULATION AND ORDER
 EXTENDING TIME TO RESPOND TO
 COMPLAINT**

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1 **STIPULATION**

2 WHEREAS, on May 2, 2011, plaintiff Ronald L. Losel (“Plaintiff”) filed a Complaint (the
3 “Complaint”) against defendants Chase Bank USA, N.A. (“Chase”) and Donald M. Palmer, D.C.
4 (“Palmer”)¹;

5 WHEREAS, the Complaint and Summons were served on and received by Chase after July
6 1, 2011;

7 WHEREAS, Chase timely filed its Notice of Removal with this Court on July 29, 2011;

8 WHEREAS, Chase must answer or otherwise respond to the Complaint by August 10,
9 2011;

10 WHEREAS, counsel for Chase and Plaintiff have agreed to extend the date by which Chase
11 must answer or otherwise respond to the Complaint to September 16, 2011;

12 WHEREAS, counsel for Chase has prior commitments justifying the extension;

13 WHEREAS, pursuant to Local Rule 144, an initial stipulation extending time to respond to
14 a complaint may be filed without approval of the Court if the stipulation is signed on behalf of all
15 parties affected by the stipulation;

16 WHEREAS, no previous extensions have been requested; and

17 WHEREAS, this Stipulation is made in good faith and not for purposes of delay.

18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
19 counsel of record, that Chase’s time to answer or otherwise respond to the Complaint hereby is
20 extended to September 16, 2011.

21 Dated: August 2, 2011

22 STROOCK & STROOCK & LAVAN LLP
23 JULIA B. STRICKLAND
24 STEPHEN J. NEWMAN

25 By: /s/ Stephen J. Newman
26 Stephen J. Newman

27 Attorneys for Defendant
28 CHASE BANK USA, N.A.

28 ¹ All of Plaintiff’s individual claims against Palmer have been settled and dismissed.

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Dated: August 2, 2011

MAJORS & FOX LLP
FRANK J. FOX

By: /s/ Frank J. Fox
Frank J. Fox

Attorneys for Plaintiff
Ronald L. Losel

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: August 8, 2011


UNITED STATES DISTRICT JUDGE