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10 Attorneys for Defendants
11 Alliance Data Systems Corporation
and Comenity Bank F/K/A World
12 Financial Network National Bank

13
14 UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION
16

17 THE PEOPLE OF THE STATE OF
CALIFORNIA EX REL., ERIC L. HERYFORD
18 DISTRICT ATTORNEY, TRINITY COUNTY,

19 Plaintiff,

20 v.

21 ALLIANCE DATA SYSTEMS
CORPORATION, COMENITY BANK F/K/A
22 WORLD FINANCIAL NETWORK
NATIONAL BANK, AND DOES I-XX,
23

24 Defendants.

Case No. 2:15-CV-02343-TLN-EFB

**STIPULATION AND ORDER
EXTENDING TIME FOR DEFENDANT
TO RESPOND TO SECOND AMENDED
COMPLAINT**

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1 Plaintiff, the People of the State of California ex rel. Eric L. Heryford, District Attorney,
2 Trinity County (“Plaintiff”) and Defendants Alliance Data Systems Corporation and Comenity
3 Bank f/k/a World Financial Network National Bank (collectively, “Defendants”), by and through
4 their attorneys of record, hereby agree and stipulate as follows:

5 WHEREAS, on September 28, 2015, Plaintiff filed his Complaint in the Superior Court of
6 the State of California, Trinity County, naming Alliance Data Systems Corporation and Comenity
7 Bank f/k/a World Financial Network National Bank, among others, as Defendants;

8 WHEREAS, on November 11, 2015, Defendants filed a Notice of Removal in this Court,
9 removing the action from the Superior Court;

10 WHEREAS, on February 5, 2016, Plaintiff filed a First Amended Complaint in this matter;

11 WHEREAS, on February 25, 2016, Defendants filed a Motion to Dismiss the Amended
12 Complaint, or in the Alternative, Motion to Strike;

13 WHEREAS, on March 23, 2016, the parties stipulated that Plaintiff may file a Second
14 Amended Complaint, pursuant to Federal Rule of Civil Procedure 15(a)(2), in lieu of filing an
15 Opposition to Defendants’ Motion to Dismiss;

16 WHEREAS, on March 23, 2016, Plaintiff filed a Second Amended Complaint;

17 WHEREAS, Defendants’ response to the Second Amended Complaint is due by no later
18 than April 6, 2016, pursuant to Federal Rule of Civil Procedure 15(a)(3);

19 WHEREAS, Plaintiffs are amenable to allowing a Defendants a brief extension of time to
20 review and respond to the allegations and claims in the newly-filed Second Amended Complaint,
21 and Defendants request such an extension;

22 WHEREAS, no trial date has been set in this matter and there is no prejudice occasioned
23 by allowing Defendants a brief extension of time to respond to the newly-filed Second Amended
24 Complaint;

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1 ACCORDINGLY, the parties hereby stipulate that Defendants shall file their response to
2 Plaintiff's Second Amended Complaint on or before April 22, 2016.

3 **IT IS SO STIPULATED.**

4 DATED: March 25, 2016

5 Terrence M. Jones
6 Taylor Steinbacher
7 Martin C. Bryce, Jr.
8 BALLARD SPAHR LLP

9 By: /s/ Taylor Steinbacher
10 Taylor Steinbacher

11 Attorneys for Defendants Alliance Data
12 Systems Corporation and Comenity Bank f/k/a
13 World Financial Network National Bank

14 DATED: March 25, 2016

15 Roland Tellis
16 BARON & BUDD, P.C.

17 By: /s/ Roland Tellis (as authorized on
18 03/25/2016)
19 Roland Tellis

20 Attorneys for Plaintiff Eric L. Heryford,
21 District Attorney, Trinity County

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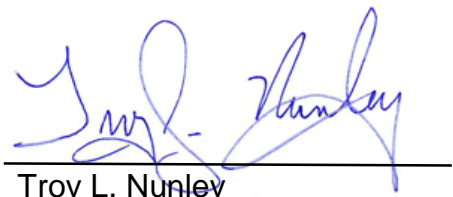
ORDER

Based upon the foregoing stipulation of the parties, and good cause appearing, it is hereby ORDERED that:

1. Defendants shall file their response to Plaintiff's Second Amended Complaint on or before April 22, 2016

IT IS SO ORDERED.

Dated: March 30, 2016



Troy L. Nunley
United States District Judge