

1 Derek W. Loeser, admitted *pro hac vice*
 2 dloeser@kellerrohrback.com
 3 Dean Kawamoto (Bar No. 232032)
 4 dkawamoto@kellerrohrback.com
KELLER ROHRBACK L.L.P.
 5 1201 Third Avenue, Suite 3200
 6 Seattle, WA 98101
 7 Tel.: (206) 623-1900
 8 Fax: (206) 623-3384

9 Thomas E. Loeser (Bar No. 202724)
 10 toml@hbsslw.com
HAGENS BERMAN SOBOL SHAPIRO LLP
 11 1301 Second Avenue, Suite 2000
 12 Seattle, WA 98101
 13 Tel.: (206) 623-7292
 14 Fax: (206) 623-0594

15 **Attorneys for Plaintiffs**
 16 *(Additional counsel listed on signature page)*

17 **UNITED STATES DISTRICT COURT**
 18 **EASTERN DISTRICT OF CALIFORNIA**
 19 **SACRAMENTO DIVISION**

20 EUGENIO AND ROSA CONTRERAS,
 21 WILLIAM PHILLIPS, TERESA BARNEY,
 22 KEITH AND TERESA MARCEL, SHERLIE
 23 CHARLOT, JENNIE MILLER, and EDWIN
 24 YAGER, on behalf of themselves and all others
 25 similarly situated,

26 Plaintiffs,

27 v.

28 NATIONSTAR MORTGAGE LLC, a Delaware
 Limited Liability Company; SOLUTIONSTAR,
 LLC (N/K/A XOME HOLDINGS LLC), a
 Delaware Limited Liability Company; and
 DOES 1 through 1000,

Defendants.

No. 2:16-cv-00302-MCE-EFB

**STIPULATED MOTION TO SET NEW
 DISCOVERY DEADLINES IN LIGHT OF
 PENDING MEDIATION AND ORDER**

Action Filed: February 12, 2016
 Trial Date: TBD

1 Plaintiffs Eugenio and Rosa Contreras, William Phillips, Teresa Barney, Keith and
2 Teresa Marcel, Sherlie Charlot, Jennie Miller, and Edwin Yager, on behalf of themselves and all
3 others similarly situated (“Plaintiffs”) and Defendants Nationstar Mortgage LLC and
4 Solutionstar Field Services LLC (erroneously sued herein as Solutionstar LLC (n/k/a Xome
5 Holding LLC)) LLC (collectively “Nationstar”) (together, the “Parties”) by and through their
6 respective counsel of record, hereby submit this Stipulated Motion To Extend Discovery
7 Deadlines in Light of Pending Mediation as set forth below.

8 Pursuant to the Parties’ Joint Report Under Rule 26 of the Federal Rules of Civil
9 Procedure, November 17, 2017, ECF No. 30, at § XI, the parties have determined that settlement
10 discussions in this matter are no longer premature, and they have engaged the services of JAMS
11 mediator the Hon. Ronald M. Sabraw (Ret.) to assist them in working to resolve this matter. The
12 parties will conduct a mediation with Hon. Sabraw on Thursday, October 10, 2019.

13 To avoid incurring the costs of fact and expert discovery while simultaneously engaging
14 in settlement negotiations, the parties request that the Court extend all deadlines on pending
15 party discovery and class certification briefing. Following conclusion of the mediation process,
16 the parties will promptly file a notice with the Court informing it of the outcome and either
17 request a schedule for filing settlement papers or an order resuming discovery. The parties agree
18 that during the mediation process they will only seek discovery necessary for resolution of the
19 matter and this agreement to limit discovery will also extend to ongoing document production
20 from third parties based on previously served subpoenas.

21 To make up for the time spent choosing a mediator, preparing for and participating in
22 initial meetings with the mediator, and conducting the mediation itself, the parties request that
23 the case deadlines for class certification briefing and fact and expert discovery be extended by
24 approximately 110 days from the dates contained in the Stipulated Motion and Order Extending
25 Case Schedule (ECF No. 85). The parties further request that ancillary deadlines relating to fact
26 and expert discovery for class certification be modified to better align with the parties’ extended
27 class certification briefing deadlines.

1 This Stipulation is the fourth extension of certain deadlines on the case schedule and is
 2 made with good cause and without prejudice to, or waiver of, any rights or defenses otherwise
 3 available to the Parties in this action. The Parties therefore respectfully request that the Court
 4 grant this Stipulated Motion to set new discovery deadlines by extending all briefing and fact and
 5 expert discovery deadlines by 110 days from the dates contained in the prior Stipulated Motion
 6 and Order Extending Case Schedule as follows:

Event	Current Deadlines	Proposed New or Extended Deadlines
Class Certification Amended Expert Report Deadline (for Plaintiffs)	8/15/2019	1/14/2020
Plaintiffs' Deadline to File Motion for Class Certification	10/4/2019	2/4/2020
Class Certification Amended Expert Report Deadline (for Defendants)		3/2/2020
Defendants' Opposition to Plaintiffs' Motion for Class Certification	11/15/2019	3/23/2020
Plaintiffs' Reply in Support of Motion for Class Certification	12/13/2019	5/4/2020
Class-Certification Expert Discovery Cutoff	9/13/2019	5/18/2020
Merits discovery cutoff	03/20/2020	7/20/2020
Disclosure of Expert Witnesses and Information Required by Rule 26(a)(2)	4/14/2020	8/14/2020
Rebuttal Expert Reports	5/22/2020	9/22/2020
Expert Discovery Cutoff	6/26/2020	10/26/2020
Deadline for Parties to File Dispositive Motions	07/24/2020	11/24/2020
Deadline for Parties to File Motions in <i>Limine</i>	Set by Court once trial date is set	Set by Court once trial date is set
Final Pretrial Conference	Set by Court once trial date is set	Set by Court once trial date is set
Trial Date	Set by Court once trial date is set	Set by Court once trial date is set

1
2
3 DATED this 16th day of July 2019.

4 By /s/ Laura R. Gerber

5 Dean Kawamoto (Bar No. 232032)
6 dkawamoto@kellerrohrback.com
7 Derek W. Loeser, admitted *pro hac vice*
8 dloeser@kellerrohrback.com
9 Gretchen S. Obrist, admitted *pro hac vice*
10 gobrist@kellerrohrback.com
11 Laura R. Gerber, admitted *pro hac vice*
12 lgerber@kellerrohrback.com
13 Rachel E. Morowitz (Bar No. 326385)
14 rmorowitz@kellerrohrback.com
15 **KELLER ROHRBACK L.L.P.**
16 1201 Third Ave, Suite 3200
17 Seattle, WA 98101
18 Tel.: (206) 623-1900
19 Fax: (206) 623-3384

20 Thomas E. Loeser (Bar No. 202724)
21 toml@hbsslaw.com
22 Nick Styant-Browne, *admitted pro hac vice*
23 nick@hbsslaw.com
24 **HAGENS BERMAN SOBOL SHAPIRO L.L.P.**
25 1301 Second Avenue, Suite 2000
26 Seattle, WA 98101
27 Tel.: (206) 623-7292
28 Fax: (206) 623-0594

Attorneys for Plaintiffs

20 DATED this 16th day of July 2019.

21 By /s/ Mary Kate Sullivan

22 John B. Sullivan (Bar No. 96742)
23 jbs@severson.com
24 Mark D. Lonergan (Bar No. 143622)
25 mdl@severson.com
26 Mary Kate Sullivan (Bar No. 180203)
27 mks@severson.com
28 Erik Kemp (Bar No. 246196)
ek@severson.com
Megan C. Kelly (Bar No. 251293)
mck@severson.com

1 **SEVERSON & WERSON**
2 One Embarcadero Center, Suite 2600
3 San Francisco, CA 94111
4 Tel: (415) 398-3344
5 Fax: (415) 956-0439

Attorneys for Defendants

6 ATTESTATION REGARDING SIGNATURES

7
8 I, Laura Gerber, attest that all signatories listed, and on whose behalf the filing is
9 submitted, concur in the filing's content and have authorized the filing.
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11 DATED: July 16, 2019

/s/ Laura R. Gerber

12 Laura R. Gerber
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16 IT IS SO ORDERED.

17 Dated: July 22, 2019

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19 _____
20 MORRISON C. ENGLAND, JR.
21 UNITED STATES DISTRICT JUDGE
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