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11 **Attorneys for Plaintiffs**
 12 *(Additional counsel listed on signature page)*

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

16 EUGENIO AND ROSA CONTRERAS,
 17 WILLIAM PHILLIPS, TERESA BARNEY,
 18 KEITH AND TERESA MARCEL, SHERLIE
 CHARLOT, JENNIE MILLER, and EDWIN
 19 YAGER, on behalf of themselves and all others
 similarly situated,

Plaintiffs,

20 v.

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

25 Defendants.

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

**STIPULATED MOTION TO SET NEW
 DISCOVERY DEADLINES 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 Set New Discovery
7 Deadlines as set forth below.

8 Pursuant to the Parties’ July 23, 2019 Stipulated Motion, (ECF No. 103), (“Stipulated
9 Motion”) the Parties attempted settlement discussions in this matter and engaged the services of
10 JAMS mediator the Hon. Ronald M. Sabraw (Ret.) to resolve this matter. The Parties prepared
11 and submitted mediation statements, and attended a mediation on Thursday, October 10, 2019, in
12 San Jose, California, and made continued efforts to engage in settlement discussions through
13 December 13, 2019. However, to date, settlement discussions have proved unsuccessful.

14 Pursuant to the Stipulated Motion, the Parties request that the Court enter an order
15 extending all deadlines on pending party discovery and class certification briefing. To make up
16 for the time spent preparing for and participating in the settlement conference and ensuing
17 settlement discussions subsequent to mediation, the Parties request that the case deadlines for
18 class certification briefing and fact and expert discovery be extended by approximately 4-6
19 months from the dates contained in the Stipulated Motion.

20 This Stipulation is the fifth extension of certain deadlines on the case schedule and is
21 made with good cause and without prejudice to, or waiver of, any rights or defenses otherwise
22 available to the Parties in this action. The Parties therefore respectfully request that the Court
23 grant this Stipulated Motion to set new discovery deadlines by extending all briefing and fact and
24 expert discovery deadlines by 4-6 months from the dates contained in the prior Stipulated Motion
25 and Order Extending Case Schedule as follows:

Event	Current Deadlines	Proposed New or Extended Deadlines
Class Certification Amended Expert Report Deadline (for Plaintiffs)	1/14/2020	5/14/2020
Plaintiffs' Deadline to File Motion for Class Certification	2/4/2020	6/4/2020
Class Certification Amended Expert Report Deadline (for Defendants)	3/2/2020	7/2/2020
Defendants' Opposition to Plaintiffs' Motion for Class Certification	3/23/2020	7/23/2020
Plaintiffs' Reply in Support of Motion for Class Certification	5/4/2020	9/4/2020
Class-Certification Expert Discovery Cutoff	5/18/2020	9/18/2020
Merits discovery cutoff	7/20/2020	1/20/2021
Disclosure of Expert Witnesses and Information Required by Rule 26(a)(2)	8/14/2020	2/15/2021
Rebuttal Expert Reports	9/22/2020	3/22/2021
Expert Discovery Cutoff	10/26/2020	4/26/2021
Deadline for Parties to File Dispositive Motions	11/24/2020	5/24/2021
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

DATED this 19th day of January 2020.

By /s/ Laura R. Gerber

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DATED this 19th day of January 2020.

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IT IS SO ORDERED.

DATED: January 6, 2020



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE