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11 **Attorneys for Plaintiffs**  
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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  
19 CHARLOT, JENNIE MILLER, and EDWIN  
20 YAGER, on behalf of themselves and all others  
21 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  
24 Delaware Limited Liability Company; and  
25 DOES 1 through 1000,

Defendants.

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

**STIPULATED MOTION TO EXTEND CASE  
SCHEDULE DEADLINES AND ORDER**

Action Filed: February 12, 2016

Trial Date: TBD

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

7 Pursuant to the Parties’ January 6, 2020 Stipulated Motion, (ECF No. 108), Plaintiffs’ class  
8 certification motion deadline is June 4, 2020, with other upcoming deadlines before and after that date  
9 relating to class certification briefing. Since then, the Parties have been exchanging written and fact  
10 discovery, and have been negotiating a deposition schedule and protocol for this matter. The Parties  
11 both need to take depositions in order to prepare their class certification briefs. While both Parties have  
12 expressed a willingness to engage in remote depositions, they have also stated that they need to be able  
13 to be in personal attendance with their clients who are being deposed. In light of COVID-19 travel  
14 restrictions, they have therefore not been able to proceed with the depositions as anticipated.

15 The Parties therefore request that the Court enter an order further extending all deadlines by  
16 two months in light of the delays in depositions due to states-wide stay-in-place orders, travel  
17 restrictions, and work-from-home directives imposed in response to the spread of COVID-19. In  
18 particular, counsel for both Plaintiffs and Defendants are restricted from traveling due to stay-at-home  
19 orders imposed by the States of Washington and California, respectively, and work-at-home directives  
20 imposed by their respective employers.

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

<b>Event</b>	<b>Current Deadlines</b>	<b>Proposed New or Extended Deadlines</b>
Class Certification Amended Expert Report Deadline (for Plaintiffs)	5/14/2020	<b>7/14/2020</b>
Plaintiffs' Deadline to File Motion for Class Certification	6/4/2020	<b>8/4/2020</b>
Class Certification Amended Expert Report Deadline (for Defendants)	7/2/2020	<b>9/2/2020</b>
Defendants' Opposition to Plaintiffs' Motion for Class Certification	7/23/2020	<b>9/23/2020</b>
Plaintiffs' Reply in Support of Motion for Class Certification	9/4/2020	<b>11/4/2020</b>
Class-Certification Expert Discovery Cutoff	9/18/2020	<b>11/18/2020</b>
Merits discovery cutoff	1/20/2021	<b>3/22/2021</b>
Disclosure of Expert Witnesses and Information Required by Rule 26(a)(2)	2/15/2021	<b>4/15/2021</b>
Rebuttal Expert Reports	3/22/2021	<b>5/21/2021</b>
Expert Discovery Cutoff	4/26/2021	<b>6/25/2021</b>
Deadline for Parties to File Dispositive Motions	5/24/2021	<b>7/23/2021</b>
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 29th day of May 2020.

By /s/ Laura R. Gerber

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DATED this 29th day of May 2020.

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*Attorneys for Defendants*

1 ATTESTATION REGARDING SIGNATURES

2  
3 I, Laura R. Gerber, attest that all signatories listed, and on whose behalf the filing is submitted,  
4 concur in the filing's content and have authorized the filing.  
5

6 DATED: April 29, 2020

/s/ Laura R. Gerber

Laura R. Gerber

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8  
9 CERTIFICATE OF SERVICE

10 I hereby certify that on May 1, 2020, I electronically filed the foregoing with the Clerk of the  
11 Court using the CM/ECF system, which in turn sent notice to all counsel of record.  
12

13  
14 /s/ Laura R. Gerber

Laura R. Gerber

15  
16 IT IS SO ORDERED.

17 Dated: May 1, 2020

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