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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  
19 CHARLOT, and JENNIE MILLER, on behalf  
of themselves and all others similarly situated,  
Plaintiffs,

20 v.

21 NATIONSTAR MORTGAGE LLC, a  
22 Delaware Limited Liability Company;  
23 SOLUTIONSTAR HOLDINGS LLC (N/K/A  
24 XOME HOLDINGS LLC), a Delaware  
25 Limited Liability Company; and  
26 SOLUTIONSTAR FIELD SERVICES LLC, a  
27 Delaware Limited Liability Company,

28 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, and Jennie Miller, on behalf of themselves and all others similarly situated  
3 (“Plaintiffs”) and Defendants Nationstar Mortgage LLC, Solutionstar Holdings LLC (n/k/a Xome  
4 Holdings LLC), and Solutionstar Field Services LLC (collectively “Nationstar”) (together, the  
5 “Parties”) by and through their respective counsel of record, hereby submit this Stipulated Motion To  
6 Extend Case Schedule Deadlines as set forth below.

7 Pursuant to the Parties’ May 1, 2020 Stipulated Motion, (ECF No. 111), Plaintiffs’ class  
8 certification motion deadline is August 4, 2020, with other upcoming deadlines before and after that  
9 date relating to class certification briefing. Since the Stipulated Motion was entered, the Parties have  
10 been exchanging written and fact discovery, negotiating production of ESI, and also further discussing  
11 a deposition schedule and protocol for this matter. The Parties both need to take depositions in order to  
12 prepare their class certification briefs. While both Parties have expressed a willingness to engage in  
13 remote depositions, they have also stated that they need to be able to be in personal attendance with  
14 their clients who are being deposed. While the Parties anticipated being able to travel in May and June  
15 for these depositions, in light of COVID-19 travel restrictions they have not been able to proceed with  
16 the depositions on the anticipated schedule.

17 The Parties therefore request that the Court enter an order further extending all deadlines by  
18 three months to allow sufficient time to schedule depositions in view of the complications arising from  
19 the unpredictable spread of COVID-19 in the states where the Parties are located, and COVID-19’s  
20 impact on work-from-home directives, travel restrictions, and quarantine orders accompanying travel.

21 This Stipulation is the seventh 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 three  
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)	7/14/2020	<b>10/21/2020</b>
Plaintiffs' Deadline to File Motion for Class Certification	8/4/2020	<b>11/11/2020</b>
Class Certification Amended Expert Report Deadline (for Defendants)	9/2/2020	<b>12/9/2020</b>
Defendants' Opposition to Plaintiffs' Motion for Class Certification	9/23/2020	<b>1/6/2021</b>
Plaintiffs' Reply in Support of Motion for Class Certification	11/4/2020	<b>2/17/2021</b>
Class-Certification Expert Discovery Cutoff	11/18/2020	<b>3/3/2021</b>
Merits discovery cutoff	3/22/2021	<b>5/21/2021</b>
Disclosure of Expert Witnesses and Information Required by Rule 26(a)(2)	4/15/2021	<b>7/15/2021</b>
Rebuttal Expert Reports	5/21/2021	<b>8/20/2021</b>
Expert Discovery Cutoff	6/25/2021	<b>9/24/2021</b>
Deadline for Parties to File Dispositive Motions	7/23/2021	<b>10/22/2021</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 13th day of July 2020.

By /s/ Laura R. Gerber

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16 *Attorneys for Plaintiffs*

17 DATED this 13th day of July 2020.

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*Attorneys for Defendants*

**IT IS SO ORDERED.**

Dated: July 16, 2020

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE

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ATTESTATION REGARDING SIGNATURES

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

DATED: July 13, 2020

/s/ Laura R. Gerber  
Laura R. Gerber

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which in turn sent notice to all counsel of record.

/s/ Laura R. Gerber  
Laura R. Gerber