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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, 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-JDP

**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’ July 16, 2020 Stipulated Motion, (ECF No. 121), Plaintiffs’ class
8 certification motion deadline is November 11, 2020, with other upcoming deadlines before and after
9 that date relating to class certification briefing. Since the Stipulated Motion was entered, the Parties
10 have been exchanging additional fact discovery and negotiating production of Defendants’ ESI, and
11 also further discussing completion of the Rule 30(b)(6) depositions of the Nationstar Mortgage,
12 Solutionstar Holdings LLC, and Solutionstar Field Services LLC. The Parties both need to take
13 depositions in order to prepare their class certification briefs and Plaintiffs have requested production
14 of Defendants’ relevant ESI prior to taking the Rule 30(b)(6) depositions. Production of that data has
15 been delayed due to the COVID-19 pandemic and Defendants’ ability to complete file transfers over
16 their employees’ home internet connections. The file transfer has recently been completed and the
17 Defendants have provided Plaintiffs with an anticipated production date in December.

18 The Parties therefore request that the Court enter an order further extending all deadlines by
19 fifteen (15) weeks to allow sufficient additional time to obtain the discovery, load and review it, and
20 schedule depositions sufficiently in advance of the class certification briefing deadline.

21 This Stipulation is the eighth 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
25 fifteen (15) weeks from the dates contained in the prior Stipulated Motion and Order Extending Case
26 Schedule as follows:

Event	Current Deadlines	Proposed New or Extended Deadlines
Class Certification Amended Expert Report Deadline (for Plaintiffs)	10/21/2020	02/03/2021
Plaintiffs' Deadline to File Motion for Class Certification	11/11/2020	02/24/2021
Class Certification Amended Expert Report Deadline (for Defendants)	12/9/2020	03/24/2021
Defendants' Opposition to Plaintiffs' Motion for Class Certification	1/6/2021	04/21/2021
Plaintiffs' Reply in Support of Motion for Class Certification	2/17/2021	06/02/2021
Class-Certification Expert Discovery Cutoff	3/3/2021	06/16/2021
Merits discovery cutoff	5/21/2021	09/03/2021
Disclosure of Expert Witnesses and Information Required by Rule 26(a)(2)	7/15/2021	10/28/2021
Rebuttal Expert Reports	8/20/2021	12/03/2021
Expert Discovery Cutoff	9/24/2021	01/07/2022
Deadline for Parties to File Dispositive Motions	10/22/2021	02/04/2022
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 8th day of October 2020.

By /s/ Laura R. Gerber

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DATED this 8th day of October 2020.

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IT IS SO ORDERED.

Dated: October 13, 2020



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE