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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
20 of themselves and all others similarly situated,
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Plaintiffs,

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,
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Defendants

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

**STIPULATED MOTION TO SET NEW
DISCOVERY DEADLINES IN LIGHT OF
SETTLEMENT DISCUSSIONS 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 Discovery Deadlines in Light of Settlement Discussions as set forth below.

7 Pursuant to the Parties’ November 17, 2017 Joint Report Under Rule 26 of the Federal Rules
8 of Civil Procedure § XI, ECF No. 30, the Parties have again determined that settlement discussions in
9 this matter are appropriate, and discussions between the Parties have been ongoing.

10 To avoid incurring the costs of additional fact and expert discovery while simultaneously
11 engaging in settlement negotiations, the Parties request that the Court extend all deadlines on pending
12 party discovery and class certification briefing. Following conclusion of this process, the Parties will
13 promptly file a notice with the Court informing it of the outcome and either request a schedule for
14 filing settlement papers or an order resuming discovery. The Parties agree that during the settlement
15 negotiation process they will only seek discovery necessary for resolution of the matter, except as it
16 relates to Defendants’ completion of production of agreed electronically stored information (“ESI”).

17 To accommodate the time period necessary to bring these settlement negotiations to a
18 conclusion and then proceed with postponed depositions before preparing class certification papers,
19 the Parties request that the case deadlines for class certification briefing and fact and expert discovery
20 be extended by approximately 100 days from the dates contained in the Stipulated Motion to Extend
21 Case Schedule Deadlines and Order, ECF No. 124.

22 This Stipulation is the ninth extension of certain deadlines on the case schedule and is made
23 with good cause and without prejudice to, or waiver of, any rights or defenses otherwise available to
24 the Parties in this action. The Parties therefore respectfully request that the Court grant this Stipulated
25 Motion to set new discovery deadlines by extending all briefing and fact and expert discovery
26 deadlines by 100 days from the dates contained in the prior Stipulated Motion to Extend Case
27 Schedule Deadlines and Order as follows:

Event	Current Deadlines	Proposed New or Extended Deadlines
Class Certification Amended Expert Report Deadline (for Plaintiffs)	02/03/2021	05/14/2021
Plaintiffs' Deadline to File Motion for Class Certification	02/24/2021	06/04/2021
Class Certification Amended Expert Report Deadline (for Defendants)	03/24/2021	07/02/2021
Defendants' Opposition to Plaintiffs' Motion for Class Certification	04/21/2021	07/30/2021
Plaintiffs' Reply in Support of Motion for Class Certification	06/02/2021	09/10/2021
Class-Certification Expert Discovery Cutoff	06/16/2021	09/24/2021
Merits discovery cutoff	09/03/2021	12/13/2021
Disclosure of Expert Witnesses and Information Required by Rule 26(a)(2)	10/28/2021	02/04/2022
Rebuttal Expert Reports	12/03/2021	03/14/2022
Expert Discovery Cutoff	01/07/2022	04/18/2022
Deadline for Parties to File Dispositive Motions	02/04/2022	05/16/2022
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 21st day of January 2021.

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DATED this 21st day of January 2021.

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Attorneys for Defendants

1 ATTESTATION REGARDING SIGNATURES

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3 I, Laura R. Gerber, attest that all signatories listed, and on whose behalf the filing is
4 submitted, concur in the filing's content and have authorized the filing.
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6 DATED: January 21, 2021

/s/ Laura R. Gerber

Laura R. Gerber

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10 IT IS SO ORDERED.

11 Dated: January 29, 2021

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