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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
20 of themselves and all others similarly situated,

21 Plaintiffs,

22 v.

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

Defendants

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

**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 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 Set New Discovery Deadlines as set forth below.

7 Pursuant to the Parties’ January 29, 2021 Stipulated Motion, ECF No. 127, the Parties again
8 attempted settlement discussions and requested an extension of all deadlines and a general stay of
9 discovery other than production of ESI by Defendants while those negotiations were ongoing. The
10 latest settlement negotiations have proven unsuccessful.

11 During this time period, Defendants completed production of ESI. To accommodate the time
12 period necessary to review documents recently produced by Defendants and complete the postponed
13 depositions before preparing class certification papers, the Parties request that the case deadlines for
14 class certification briefing and fact and expert discovery be extended by approximately 110 days from
15 the dates contained in the Stipulated Motion to Extend Case Schedule Deadlines and Order, ECF No.
16 127.

17 This Stipulation is the tenth extension of certain deadlines on the case schedule and is made
18 with good cause and without prejudice to, or waiver of, any rights or defenses otherwise available to
19 the Parties in this action. The Parties therefore respectfully request that the Court grant this Stipulated
20 Motion to set new discovery deadlines by extending all briefing and fact and expert discovery
21 deadlines by 110 days from the dates contained in the prior Stipulated Motion to Extend Case
22 Schedule Deadlines and Order as follows:

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Event	Current Deadlines	Proposed New or Extended Deadlines
Class Certification Amended Expert Report Deadline (for Plaintiffs)	05/14/2021	09/03/2021

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1	Plaintiffs' Deadline to File Motion for Class Certification	06/04/2021	09/22/2021
2	Class Certification Amended Expert Report Deadline (for Defendants)	07/02/2021	10/20/2021
3	Defendants' Opposition to Plaintiffs' Motion for Class Certification	07/30/2021	11/17/2021
4	Plaintiffs' Reply in Support of Motion for Class Certification	09/10/2021	12/29/2021
5	Class-Certification Expert Discovery Cutoff	09/24/2021	01/22/2022
6	Merits discovery cutoff	12/13/2021	04/22/2022
7	Disclosure of Expert Witnesses and Information Required by Rule 26(a)(2)	02/04/2022	05/25/2022
8	Rebuttal Expert Reports	03/14/2022	07/01/2022
9	Expert Discovery Cutoff	04/18/2022	08/08/2022
10	Deadline for Parties to File Dispositive Motions	05/16/2022	09/02/2022
11	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
12	Final Pretrial Conference	Set by Court once trial date is set	Set by Court once trial date is set
13	Trial Date	Set by Court once trial date is set	Set by Court once trial date is set

14 DATED this 14th day of May 2021.

15 By /s/ Laura R. Gerber
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DATED this 14 day of May 2021.

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Attorneys for Defendants

IT IS SO ORDERED.

Dated: May 19, 2021



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