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Attorneys for Defendants

14 **UNITED STATES DISTRICT COURT**
 15 **EASTERN DISTRICT OF CALIFORNIA**
 16 **SACRAMENTO DIVISION**

17 EUGENIO AND ROSA CONTRERAS,
 18 WILLIAM PHILLIPS, TERESA BARNEY,
 19 KEITH AND TERESA MARCEL, SHERLIE
 CHARLOT, JENNIE MILLER, and EDWARD
 YAGER, on behalf of themselves and all others
 similarly situated,

20 Plaintiffs,

21 v.

22 NATIONSTAR MORTGAGE LLC, a Delaware
 23 Limited Liability Company; SOLUTIONSTAR,
 24 LLC (N/K/A XOME HOLDINGS LLC), a
 Delaware Limited Liability Company; and
 25 DOES 1 through 1000,

26 Defendants.

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

STIPULATED MOTION AND ORDER
EXTENDING CASE SCHEDULE

Action Filed: February 12, 2016
 Trial Date: TBD

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 STIPULATION EXTENDING CASE SCHEDULE

1 Plaintiffs Eugenio and Rosa Contreras, William Phillips, Teresa Barney, Keith and Teresa
2 Marcel, Sherlie Charlot, Jennie Miller, and Edward Yager, on behalf of themselves and all others
3 similarly situated (“Plaintiffs”) and Defendants Nationstar Mortgage LLC and Solutionstar LLC
4 (“Nationstar”) (together, the “Parties”) by and through their respective counsel of record, hereby submit
5 this Stipulated Motion for entry of an amended case schedule as set forth below.
6

7 On January 4, 2019 the Court entered a stipulation and order setting certain case deadlines,
8 including a class certification motion deadline of April 25, 2019. (ECF No. 71). On February 14, 2019,
9 the Court entered an order granting in part and denying in part Defendants’ Motion to Dismiss and
10 granted Plaintiffs 20 days, or until March 11, 2019, to file an Amended Complaint. (ECF No. 79).
11 Plaintiffs did not file an Amended Complaint. Pursuant to the Stipulation and Order signed on March 20,
12 2019, (ECF No. 82), Defendants’ deadline to file a response to the operative Second Amended
13 Complaint is presently April 1, 2019. As set forth below, the Parties have agreed to extend this deadline
14 to April 15, 2019.
15

16 The current and proposed case deadlines are set forth in the chart below. Both before and since
17 entry of the January 4 stipulation and order the parties have been actively engaged in discovery and have
18 been actively negotiating numerous outstanding discovery issues relating to both class certification
19 discovery and merits discovery. Defendants have served Interrogatories, and Plaintiffs have served
20 Requests for Production, Interrogatories, and two Rule 30(b)(6) deposition notices. Plaintiffs have now
21 taken two Rule 30(b)(6) depositions and three remain to be taken, but Plaintiffs require additional
22 document productions before the additional Rule 30(b)(6) depositions can be completed and before they
23 can prepare their class certification motion. Thus, given the fact that the class certification deadline is
24 April 25, 2019, but the Answer has not yet been filed, and the parties are still engaged in numerous
25 ongoing discovery negotiations such that Plaintiffs may be required to file a motion to compel, the
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1 parties believe that an extension of all the case deadlines by six months will help ensure the fair and
2 efficient litigation of this case.

3 This Stipulation is the third extension of the case schedule and is made with good cause and
4 without prejudice to, or waiver of, any rights or defenses otherwise available to the Parties in this action.
5 The Parties therefore respectfully request the Court grant this Stipulated Motion and extend the case
6 deadlines as follows.
7

Event	Current Deadlines	Proposed New or Extended Deadlines
Deadline to File Answer to Second Amended Complaint	04/01/19	04/15/2019
Class Certification Amended Expert Report Deadline		8/15/2019
Class-Certification Expert Discovery Cutoff	04/11/2019	9/13/2019
Plaintiffs' Deadline to File Motion for Class Certification	04/25/2019	10/4/2019
Defendants' Opposition to Plaintiffs' Motion for Class Certification	05/22/2019	11/15/2019
Plaintiffs' Reply in Support of Motion for Class Certification	06/07/2019	12/13/2019
Merits discovery cutoff	09/13/2019	3/20/2020
Disclosure of Expert Witnesses and Information Required by Rule 26(a)(2)	10/11/2019	4/17/2020
Rebuttal Expert Reports	11/15/2019	5/22/2020
Expert Discovery Cutoff	12/27/2019	6/26/2020
Deadline for Parties to File Dispositive Motions	01/24/2020	7/24/2020
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

1 DATED this 29th day of March, 2019.

2 By /s/ Laura R. Gerber

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40 *Attorneys for Defendants*

1 ATTESTATION REGARDING SIGNATURES

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

5 DATED: March 29, 2019

6 /s/ Laura R. Gerber
7 Laura R. Gerber

8 CERTIFICATE OF SERVICE

9 I hereby certify that on April 8, 2019, I electronically filed the foregoing with the Clerk of the
10 Court using the CM/ECF system, which in turn sent notice to all counsel of record.
11

12 /s/ Laura R. Gerber
13 Laura Gerber

14
15 IT IS SO ORDERED.

16 Dated: April 8, 2019

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18 MORRISON C. ENGLAND, JR
19 UNITED STATES DISTRICT JUDGE
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