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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MIKE CORTES, on Behalf of Himself and all
Others Similarly Situated,

Plaintiff,

v.

NATIONAL CREDIT ADJUSTERS, L.L.C.,

Defendant.

Case No. 2:16-cv-00823-MCE-EFB

**STIPULATION TO CONTINUE
DEADLINE TO FILE DISPOSITIONAL
PAPERS PURSUANT TO LOCAL
RULE 160 AND ORDER**

1 Pursuant to Civil Local Rule 143, Plaintiff Mike Cortes (“Plaintiff”) and Defendant
2 National Credit Adjusters, L.L.C. (“Defendant”) (collectively, the “Parties”), by and through their
3 respective counsel, stipulate as follows:

4 WHEREAS, on January 18, 2019, the Parties participated in a mediation with Martin
5 Quinn, Esq., at JAMS in San Francisco, California;

6 WHEREAS, on February 5, 2019, the Parties executed a binding Term Sheet setting out an
7 agreement to settle all claims in this action on a class basis;

8 WHEREAS, on February 6, 2019, upon stipulation of the Parties and notice of the
9 settlement, the Court vacated all remaining pretrial deadlines and ordered the Parties to file
10 dispositional papers pursuant to Local Rule 160 by February 28, 2019 (Dkt. No. 35);

11 WHEREAS, the Parties are still working on drafting the full class settlement agreement
12 (along with all of the relevant exhibits thereto, *i.e.*, long form and short-form notice documents,
13 proposed final approval and judgment orders, *etc.*);

14 WHEREAS, once the full class settlement agreement is executed, Plaintiff intends to file a
15 motion for preliminary approval of the settlement and provide the Court with a copy of the
16 executed class settlement agreement at that time;

17 WHEREAS, due to the extensive time needed to draft (and negotiate) the full class action
18 settlement agreement and the motion for preliminary approval, the Parties anticipate that they will
19 be able to execute the class action settlement agreement and that Plaintiff will be able to file a
20 motion for preliminary approval within 120 days of this filing;

21 NOW THEREFORE, IT IS STIPULATED AND AGREED by the Parties, by and through
22 their counsel, that the Parties’ deadline to file dispositional papers pursuant to Local Rule 160 shall
23 be extended to June 28, 2019.

24 Dated: February 28, 2019

Respectfully submitted,

BURSOR & FISHER, P.A.

26 By: /s/ Yeremey Krivoshey
27 Yeremey Krivoshey
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Attorneys for Plaintiff

Dated: February 28, 2019

Respectfully submitted,

**SESSIONS, FISHMAN, NATHAN & ISRAEL,
L.L.P.**

By: /s/ James K. Schultz
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*Attorneys for Defendant National Credit Adjusters,
LLC*


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3 **ORDER**

4 Upon review of the Parties' Stipulation (ECF No. 36), IT IS HEREBY ORDERED that the
5 Parties' deadline to file dispositional papers pursuant to Local Rule 160 shall be extended to **June**
6 **28, 2019.**

7 IT IS SO ORDERED.

8 Dated: March 4, 2019

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11 MORRISON C. ENGLAND, JR.
12 UNITED STATES DISTRICT JUDGE
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