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**BURSOR & FISHER, P.A.**  
L. Timothy Fisher (State Bar No. 191626)  
Yeremey O. Krivoshey (State Bar No.295032)  
1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Email: ltfisher@bursor.com  
ykrivoshey@bursor.com

**BURSOR & FISHER, P.A.**  
Scott A. Bursor (State Bar No. 276006)  
2665 S. Bayshore Dr., Suite 220  
Miami, FL 33133-5402  
Telephone: (305) 330-5512  
Facsimile: (305) 676-9006  
E-Mail: scott@bursor.com

*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 National  
2 Credit Adjusters, L.L.C. (“Defendant”) (collectively, the “Parties”), by and through their respective  
3 counsel, stipulate as follows:

4 WHEREAS, on January 18, 2019, the Parties participated in a mediation with Martin Quinn,  
5 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 settlement,  
9 the Court vacated all remaining pretrial deadlines and ordered the Parties to file dispositional papers  
10 pursuant to Local Rule 160 by February 28, 2019 (Dkt. No. 35);

11 WHEREAS, on June 28, 2019, upon stipulation of the Parties, the Court extended the Parties’  
12 deadline to file dispositional papers pursuant to Local Rule 160 to June 28, 2019 (Dkt. 37);

13 WHEREAS, the Parties have made significant progress but need more time to finalize the full  
14 class settlement agreement (along with all of the relevant exhibits thereto, *i.e.*, long form and short-  
15 form notice documents, proposed final approval and judgment orders, *etc.*);

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

19 WHEREAS, due to the extensive time needed to draft (and negotiate) the full class action  
20 settlement agreement and the motion for preliminary approval, the Parties anticipate that they will be  
21 able to execute the class action settlement agreement and that Plaintiff will be able to file a motion  
22 for preliminary approval by August 9, 2019;

23 NOW THEREFORE, IT IS STIPULATED AND AGREED by the Parties, by and through  
24 their counsel, that the Parties’ deadline to file dispositional papers pursuant to Local Rule 160 shall  
25 be extended to August 9, 2019.

1  
2 Dated: June 28, 2019

Respectfully submitted,

3  
4 **BURSOR & FISHER, P.A.**

By: /s/ Yeremey Krivoshey  
Yeremey Krivoshey

5 L. Timothy Fisher (State Bar No. 191626)  
6 Yeremey Krivoshey (State Bar No. 295032)  
7 1990 North California Boulevard, Suite 940  
8 Walnut Creek, CA 94596  
9 Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-Mail: ltfisher@bursor.com  
ykrivoshey@bursor.com

10 **BURSOR & FISHER, P.A.**

11 Scott A. Bursor (State Bar No. 276006)  
12 2665 S. Bayshore Dr., Suite 220  
13 Miami, FL 33133-5402  
14 Telephone: (305) 330-5512  
Facsimile: (305) 676-9006  
E-Mail: scott@bursor.com

*Attorneys for Plaintiff*

15 Dated: June 28, 2019

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

17 By: /s/ James K. Schultz  
James K. Schultz

18 James K. Schultz (State Bar No. 309945)  
19 Debbie P. Kirkpatrick (State Bar No. 207112)  
20 1545 Hotel Circle South, Suite 150  
21 San Diego, CA 92108  
Telephone: (619) 758-1891  
Facsimile: (619) 296-2013  
E-Mail: jschultz@sessions.legal  
dkirkpatrick@sessions.legal

22 *Attorneys for Defendant National Credit Adjusters, LLC*


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**ORDER**

IT IS HEREBY ORDERED the Parties' deadline to file dispositional papers pursuant to Local Rule 160 shall be extended to **August 9, 2019**.

IT IS SO ORDERED.

Dated: July 3, 2019

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE