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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 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 March 5, 2019, upon stipulation of the Parties, the Court extended the
12 Parties’ deadline to file dispositional papers pursuant to Local Rule 160 to June 28, 2019 (Dkt. 37);

13 WHEREAS, on July 19, 2019, upon stipulation of the Parties, the Court again extended the
14 Parties’ deadline to file dispositional papers pursuant to Local Rule 160 to August 9, 2019 (Dkt. 40);

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

18 WHEREAS, the Parties also require two more weeks to gather and verify contact information
19 for as many class members as possible such that the proposed notice plan can provide notice to as
20 many class members as reasonably possible;

21 WHEREAS, the Parties require a full accounting of class members’ contact information to
22 provide the Court with sufficient information to evaluate the adequacy of the proposed notice plan;

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

26 WHEREAS, due to the additional time needed to finalize the full class action settlement
27 agreement and the motion for preliminary approval, the Parties anticipate that they will be able to
28

1 execute the class action settlement agreement and that Plaintiff will be able to file a motion for
2 preliminary approval by August 9, 2019;

3 NOW THEREFORE, IT IS STUPULATED AND AGREED by the Parties, by and through
4 their counsel, that the Parties' deadline to file dispositional papers pursuant to Local Rule 160 shall
5 be extended to August 23, 2019.

6 Dated: August 9, 2019

7 Respectfully submitted,

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

9 By: /s/ Yeremey Krivoshey
Yeremey Krivoshey

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20 *Attorneys for Plaintiff*

21 Dated: August 9, 2019

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

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

ORDER

IT IS HEREBY ORDERED the Parties' deadline to file dispositional papers pursuant to Local Rule 160 shall be extended to **August 23, 2019**.

IT IS SO ORDERED.

Dated: August 20, 2019



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE

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