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22 **UNITED STATES DISTRICT COURT**  
 23 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

24 Laura Wylie,  
 25  
 26 Plaintiff,  
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 28 v.  
 29 Equifax, Inc.; Bank of America, N.A.; and  
 30 DOES 1 through 100 inclusive,  
 31  
 32 Defendants.

Case No. 2:17-cv-02333-JAM-KJN  
**JOINT STIPULATION TO EXTEND TIME  
 TO RESPOND TO INITIAL COMPLAINT  
 PURSUANT TO L.R. 144(a); ORDER**  
 Complaint Filed: November 7, 2017  
 Honorable John A. Mendez  
 Current Response Deadline: 2/9/2018  
 New Response Deadline: 3/2/2018

1 This Stipulation is made by and between Plaintiff Laura Wiley (“Plaintiff”) and Defendant  
2 Bank of America, N.A. (“BANA”) through their respective counsel and in light of the following  
3 facts:

4 **RECITALS**

5 WHEREAS; on November 7, 2017, Plaintiff filed this action against BANA, and a  
6 summons was issued by the Court;

7 WHEREAS; BANA was served a copy of the Complaint and Summons on December 29,  
8 2017;

9 WHEREAS; on January 17, 2018, the Parties filed a first joint stipulation for extension of  
10 time for BANA to respond to the Complaint by twenty-one days;

11 WHEREAS; BANA’s current deadline to respond to the Complaint is presently February  
12 9, 2018;

13 WHEREAS; BANA and Plaintiff are continuing to engage in good-faith settlement  
14 discussions in an effort to resolve the case without wasting the Court’s time and resources;

15 WHEREAS; BANA, through counsel, has requested a second twenty-one (21) day  
16 extension of time within which to respond to the Complaint and Plaintiff, through counsel, has  
17 agreed to this request.

18 **STIPULATION**

19 THEREFORE, the parties agree through their respective attorneys to the following:

- 20 1. BANA’s time to file a responsive pleading in this action shall be extended by  
21 twenty-one days up to and including March 2, 2018.
- 22 2. This is the second extension of time to respond for BANA.
- 23 3. This extension will not affect any other deadline in this case.
- 24 4. This stipulation is without prejudice to the rights, claims, arguments, and defenses  
25 of all parties.

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All other signatories listed, and on whose behalf the filing is submitted, concur in the filings content and have authorized the filing.

DATED: February 9, 2018

**MCGUIREWOODS LLP**

By: /s/ Anthony Q. Le  
Anthony Q. Le

Attorneys for Defendant  
Bank of America, N.A.

DATED: February 9, 2018

**SAGARIA LAW LLP**

By: /s/ Elliot Gale (with permission)  
Elliot Gale

Attorneys for Plaintiff  
Laura Wiley

1 **ORDER**

2  
3 This Court, having received and reviewed the stipulation of the parties referenced  
4 immediately above, and finding good cause therefore, hereby enters the stipulation as the order of  
5 the Court. Accordingly,

- 6 (1) Defendant Bank of America, N.A.’s time to file a responsive pleading in this action  
7 shall be extended by twenty-one days up to and including March 2, 2018.  
8 (2) This is the second extension of time to respond for BANA.  
9 (3) This extension will not affect any other deadline in this case.  
10 (4) This stipulation is without prejudice to the rights, claims, arguments, and defenses  
11 of all parties.

12  
13 **IT IS SO ORDERED.**

14  
15 Dated: 2/9/2018

/s/ John A. Mendez \_\_\_\_\_  
HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE