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 21 Crystal Miller

22 **UNITED STATES DISTRICT COURT**

23 **EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

24 Crystal Miller,
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 26 Plaintiff,
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 28 v.
 29 Experian Information Solutions, Inc.; Equifax,
 30 Inc.; Bank of America, N.A.; Harley Davidson
 31 Credit Corporation; Wells Fargo Bank, N.A.;
 32 and DOES 1 through 100 inclusive,
 33
 34 Defendants.

Case No. 2:18-cv-00126-JAM-CKD

**SECOND JOINT STIPULATION TO
 EXTEND TIME TO RESPOND TO
 INITIAL COMPLAINT PURSUANT TO
 L.R. 144(a); ORDER**

Complaint Filed: January 19, 2018

Honorable John A. Mendez

Current Response Deadline: 4/5/2018

New Response Deadline: 5/3/2018

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

4 **RECITALS**

5 WHEREAS; on January 19, 2018, 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 February 22,
8 2018;

9 WHEREAS; BANA’s current deadline to respond to the Complaint is presently April 5,
10 2018;

11 WHEREAS; BANA and Plaintiff are continuing to engage in good-faith settlement
12 discussions and believe that continued settlement discussions will result in resolution of the case
13 without wasting the Court and the Parties’ time and resources;

14 WHEREAS; BANA, through counsel, has requested a twenty-eight (28) day extension of
15 time within which to respond to the Complaint and Plaintiff, through counsel, has agreed to this
16 request.

17 **STIPULATION**

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

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

MCGUIREWOODS LLP

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

Attorneys for Defendant
Bank of America, N.A.

DATED: April 3, 2018

SAGARIA LAW LLP

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

Attorneys for Plaintiff
Crystal Miller

1 **ORDER**

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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-eight days up to and including May 3, 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.**

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15 Dated: 4/3/2018

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

1 **CERTIFICATE OF SERVICE**

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3 I hereby certify that on April 3, 2018, I electronically filed the foregoing with the Clerk of

4 Court of the United States District Court, Eastern District of California, using the CM/ECF

5 system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF

6 system.

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8 /s/ Anthony Q. Le

9 Anthony Q. Le

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