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Attorneys for Defendant
 PHH MORTGAGE CORPORATION

13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA

15 COMPU-LINK CORPORATION, DBA
 16 CELINK a Michigan Corporation,
 17 Plaintiff,

18 v.

19 PHH MORTGAGE CORPORATION, a
 20 New Jersey Corporation,
 21 Defendant.

Case No. 2:22-cv-00983-KJM-KJN

**JOINT STIPULATION FOR
 EXTENSION OF TIME TO FILE AND
 RESPOND TO FIRST AMENDED
 COMPLAINT; [PROPOSED] ORDER**

Action Filed: June 3, 2022

Trial Date: None Set

22 Plaintiff Compu-Link Corporation, dba Celink (“Celink”), and Defendant PHH Mortgage
 23 Corporation (“PHH”) (collectively, the “Parties”) in the above-captioned action, by and through
 24 their respective counsel of record, file this Joint Stipulation for Extension of Time to File and
 25 Respond to First Amended Complaint.

26 WHEREAS, Celink filed the Complaint in this action on June 3, 2022 (ECF #1);

1 WHEREAS, PHH filed a motion to dismiss the Complaint (“Motion to Dismiss”) to dismiss
2 the Complaint on July 29, 2022 (ECF #12);

3 WHEREAS, the Court issued an Order, dated December 27, 2022, granting PHH’s Motion
4 Dismiss in part, with leave to amend (“Order”) (ECF #34);

5 WHEREAS, the Order included a Rule 16 Scheduling Order setting a January 20, 2023
6 deadline for Celinek to file an amended complaint and directing PHH to respond within the
7 timeframe allowed under the Federal Rules and this District’s Local Rules;

8 WHEREAS, Celinek intends to file an amended complaint;

9 WHEREAS, the Parties have met and conferred concerning the deadlines for filing and
10 responding to an amended complaint;

11 WHEREAS, the Parties have not sought any previous extensions with respect to these
12 deadlines;

13 IT IS THEREFORE STIPULATED, AGREED, AND JOINTLY REQUESTED by the
14 Parties that the Court amend the deadlines for Celinek to file, and PHH to respond to, an amended
15 Complaint as follows:

- 16 • The deadline for Celinek to file an amended complaint shall be February 17,
17 2023.
- 18 • The deadline for PHH to respond to Celinek’s amended complaint shall be
19 March 17, 2023.
- 20 • In the event PHH moves to dismiss the amended complaint, the deadlines for
21 Celinek’s Opposition and PHH’s Reply will be governed by the Federal Rules
22 of Civil Procedure and this District’s Local Rules.
- 23 • Initial Disclosures shall be filed no later than 14 days after PHH answers
24 Celinek’s amended complaint.
- 25 • The Parties shall file a stipulated protective order and ESI Protocol no later than
26 February 1, 2023.

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IT IS SO STIPULATED.

Dated: January 12, 2023

FOSTER GARVEY PC

By: /s/ Jennifer L. Gray

Jennifer L. Gray
Christopher G. Emch

*Attorneys for Plaintiff Compu-Link
Corporation, dba Celink*

Dated: January 12, 2023

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ Aaron M. Rubin

Richard A. Jacobsen
Thomas N. Kidera
Aaron M. Rubin

*Attorneys for Defendant PHH Mortgage
Corporation*

FILER'S ATTESTATION

**Filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: January 12, 2023

/s/ Jennifer L. Gray

Jennifer L. Gray

ORDER

Having reviewed the Parties' JOINT STIPULATION FOR EXTENSION OF TIME TO FILE AND RESPOND TO AMENDED COMPLAINT, it is Ordered that:

- The deadline for Celinek to file an amended complaint shall be February 17, 2023
- The deadline for PHH to respond to Celinek's amended complaint shall be March 17, 2023.
- In the event PHH moves to dismiss the amended complaint, the deadlines for Celinek's Opposition and PHH's Reply will be governed by the Federal Rules of Civil Procedure and this District's Local Rules.
- Initial Disclosures shall be filed no later than 14 days after PHH answers Celinek's amended complaint.
- The Parties shall file a stipulated protective order and ESI Protocol no later than February 1, 2023.

DATED: January 19, 2023.



CHIEF UNITED STATES DISTRICT JUDGE