

1 DARYL S. LANDY, SBN 136288
 BARBARA I. ANTONUCCI, SBN 209039
 2 SACHA M. STEENHOEK, SBN 253743
 MORGAN, LEWIS & BOCKIUS LLP
 3 2 Palo Alto Square
 3000 El Camino Real, Suite 700
 4 Palo Alto, CA 94306-2212
 Tel: 650.843.4000
 5 Fax: 650.843.4001

6 Attorneys for Defendant
 WELLS FARGO INVESTMENTS, LLC
 7

H. TIM HOFFMAN, SBN 049141
 ARTHUR W. LAZEAR, SBN 083603
 MORGAN M. MACK, SBN 212659
 HOFFMAN & LAZEAR
 180 Grand Avenue, Suite 1550
 Oakland, California 94612
 Tel: 510.763.5700
 Fax: 510.835.1311

Attorneys for Plaintiffs
 JERRY CHU, THOMAS CALFORDA,
 LEBRONE KING, and TAMARA
 TURKISHER

8 SCOTT E. COLE, SBN 160744
 TIMOTHY P. RUMBERGER, SBN 145984
 9 SCOTT COLE & ASSOCIATES, APC
 1970 Broadway, 9th Floor
 10 Oakland, California 94612
 Tel: 510.891.9800
 11 Fax: 510.891.7030

12 Attorneys for Plaintiff
 ANDREA X. BULOW

13
 14 UNITED STATES DISTRICT COURT
 15 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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17 JERRY CHU, ANDREA X. BULOW,
 THOMAS CALFORDA, LEBRONE KING, and
 18 TAMARA TURKISHER, individually and on
 behalf of all others similarly situated,
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20 Plaintiffs,

21 v.

22 WELLS FARGO INVESTMENTS, LLC, and
 DOES 1 through 50, Inclusive,
 23

24 Defendants.

25 AND CONSOLIDATED ACTIONS

Case Nos. C-05-04526 MHP;
 C-06-07924 MHP

Consolidated Action

**STIPULATION AND [PROPOSED]
 ORDER MODIFYING DEADLINES**

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STIPULATION

WHEREAS, on July 28, 2009, the Court issued an order approving a stipulation between the parties setting forth deadlines for filing dispositive motions, motions for class certification, and other items;

WHEREAS, according to the Court's July 28, 2009 Order, the deadline for filing dispositive motions is December 14, 2009, with oppositions due on January 11, 2010, and replies due on January 25, 2010, and the deadline for filing a motion for class certification is April 8, 2010, with opposition due on June 7, 2010, and reply due on July 12, 2010;

WHEREAS, on December 9, 2009, the Court issued an order delaying the deadline for the filing of dispositive motions until December 21, 2009 in order for the parties to discuss the possibility of conducting an additional mediation session;

WHEREAS, the parties have agreed to conduct an additional private mediation tentatively scheduled for January 20, 2009 and intended to occur before January 31, 2010, and would like to focus their energies and resources on attempting to resolve this case;

WHEREAS, in light of the above factors, the parties have agreed to seek to extend all existing pending deadlines to a mutually agreed upon schedule;

WHEREAS, the parties will submit to the Court the proposed revised deadlines within ten (10) days of the completion of the mediation, if such mediation is unsuccessful;

NOW, THEREFORE, Plaintiffs and Wells Fargo Investments, LLC, through their undersigned respective counsel, stipulate and request that the Court vacate all existing pending deadlines until after the parties attend and participate in mediation.

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To avoid prejudice to the parties and to facilitate case management, GOOD CAUSE exists to vacate the deadlines in this action as described herein.

Dated: December 16, 2009

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Daryl Landy
Daryl Landy
Attorneys for Defendant
WELLS FARGO INVESTMENTS, LLC

Dated: December 16, 2009

HOFFMAN & LAZEAR

By: /s/ Morgan Mack (as authorized on December 15, 2009)
Morgan Mack
Attorneys for Plaintiffs
JERRY CHU, THOMAS CALFORDA,
LEBRONE KING, and TAMARA
TURKISHER

Dated: December 16, 2009

SCOTT COLE & ASSOCIATES, APC

By: /s/ Scott Cole (as authorized on December 15, 2009)
Scott Cole
Attorneys for Plaintiff
ANDREA X. BULOW

ORDER

In light of the foregoing STIPULATION of the parties, the Court ORDERS that all existing pending deadlines are vacated until after the parties attend mediation. The Court further ORDERS that, within ten (10) days of the mediation, the parties will submit to the Court proposed revised deadlines, if necessary.

Dated: 12/17/2009

