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Attorneys for Defendants
 BLUEHIPPO FUNDING, LLC and
 BLUEHIPPO CAPITAL, LLC

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN FRANCISCO DIVISION

20 ROYLENE RAY, KELLY CANNON,
 KARLA HODGES and LAKETA
 21 COULTER et al., individually and on
 behalf of others similarly situated,,
 22

23 Plaintiffs,

24 vs.

25 BLUEHIPPO FUNDING, LLC,
 BLUEHIPPO CAPITAL, LLC and
 26 GATEWAY, INC.,

27 Defendants.

Case No. C-06-1807 JSW EMC

**JOINT REQUEST OF ALL PARTIES FOR
 THIRTY DAY STAY OF DEADLINES TO
 PERMIT PREPARATION OF
 DOCUMENTATION FOR CLASS
 ACTION SETTLEMENT**
AND ORDER THEREON

Trial Date: February 1, 2010

1 Plaintiffs Roylene Ray, Kelly Cannon, Carla Hodges Laketa Coulter, Linda Pullum,
2 Mayra Ayar, Esperanza Ochoa and Janis Shoemaker (collectively “Plaintiffs”), defendants
3 BlueHippo Funding LLC, BlueHippo Capital, LLC (collectively “BlueHippo”) and defendant
4 Gateway, Inc. (“Gateway”), by and through counsel, hereby stipulate as follows and respectfully
5 request the Court to enter the accompanying proposed order:

6 1. The parties reached a settlement in principle of all claims and issues in this
7 litigation on January 27, 2009 with the able and much appreciated assistance of the Honorable
8 Joseph C. Spero.

9 2. Because the settlement will include resolution of class claims, the settlement terms
10 will need to be submitted to the Court for preliminary approval and ultimately for final approval.
11 Preparation of the stipulation of settlement and the accompanying documents for preliminary
12 approval will require the input and review of several parties and their counsel as well as
13 verification of various customer data.

14 3. So as to permit them to complete these tasks, the parties respectfully request that
15 the Court: (1) vacate the hearing on BlueHippo’s currently pending motion to dismiss (set for
16 February 20, 2009), suspend further briefing and withhold any decision on that motion; (2)
17 suspend all deadlines in connection with the class certification briefing and hearing (Plaintiffs’
18 motion is currently due on February 19, 2009 and a hearing is set for April 3, 2009); and (3)
19 temporarily stay, for a period of thirty (30) days, all litigation activity in the case unnecessary to
20 the preparation of the stipulation of settlement and preliminary approval papers (various
21 depositions of the class representatives and other discovery issues are scheduled over the next few
22 weeks in anticipation of the class certification motion deadlines). This will reduce unnecessary
23 burden on the Court and avoid the unnecessary expenditure of the parties’ funds and resources
24 that can otherwise be used for settlement. Moreover, the parties’ counsel wish to focus on
25 drafting the required settlement documents rather than engaging in continued litigation efforts
26 which, in all likelihood, will prove to be unnecessary.

27 4. The parties will either present the proposed settlement to the Court for preliminary
28 approval within 30 days or inform the Court of the status of the matter and request appropriate

1 scheduling changes at that time. The parties are motivated to complete the settlement documents
2 and will work diligently toward that end.

3 SO STIPULATED.

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5 Dated: January 28, 2009.

BRAMSON, PLUTZIK, MAHLER &
BIRKHAUSER, LLP

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By: _____ /s/
Robert M. Bramson

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Attorneys for Plaintiffs

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1 Dated: January 28, 2009.

FARELLA BRAUN & MARTEL LLP

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By: _____ /s/
C. Brandon Wisoff

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Attorneys for Defendants
BLUEHIPPO FUNDING, LLC and
BLUEHIPPO CAPITAL, LLC

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*I hereby attest that I have received authority
from the other counsel signatories to file this
document.*

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[Signatures Continued on Next Page]

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Dated: January 28, 2009

QUINN EMANUEL URQUHART OLIVER
& HEDGES

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By: _____ /s/
Jeffrey D. McFarland

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Attorneys for Defendant
GATEWAY, INC.

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~~[PROPOSED]~~ ORDER

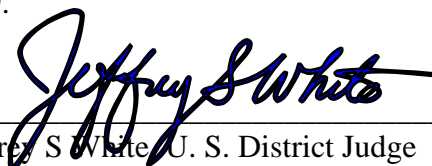
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In accordance with the above stipulation and for good cause shown, IT IS SO ORDERED.

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Dated: January 29, 2009.

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Jeffrey S. White, U. S. District Judge

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