

1 BONNETT, FAIRBOURN, FRIEDMAN
 & BALINT, P.C.
 2 Andrew S. Friedman (Admitted *Pro Hac Vice*)
 3 Wendy J. Harrison (CA SBN 151090)
 2901 North Central Avenue, Suite 1000
 4 Phoenix, Arizona 85012
 Tel: (602) 274-1100
 5 Fax: (602) 274-1199
 6 E-mail: afriedman@bffb.com
 wharrison@bffb.com

7 RODDY KLEIN & RYAN
 8 Gary Klein (Admitted *Pro Hac Vice*)
 Shennan Kavanagh (To be admitted *Pro Hac Vice*)
 9 727 Atlantic Avenue
 Boston, MA 02111-2810
 10 Tel: (617) 357-5500, ext. 15
 Fax: (617) 357-5030

11 [*Additional counsel listed on signature page*]

12 Attorneys for Plaintiffs
 13 and the Proposed Class

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

18 ANA RAMIREZ and ISMAEL RAMIREZ,)
 19 on behalf of themselves and all others)
 20 similarly situated,)

21 Plaintiffs,)

22 vs.)

24 GREENPOINT MORTGAGE FUNDING,)
 25 INC.,)

26 Defendant.)
 27)
 28)

No. C 08-00369 TEH

CLASS ACTION

**STIPULATION AND [PROPOSED]
 ORDER TO VACATE STAY AND TO
 SET SCHEDULE FOR FURTHER
 PROCEEDINGS**

Date: March 8, 2010
 Time: 10:00 am
 Court: Honorable Thelton E. Henderson
 Dept: Courtroom 12, 19th Floor

1 WHEREAS the parties have agreed not to seek approval of the Stipulation and
2 Agreement of Settlement previously lodged with the Court [Docket No. 143]; and

3 WHEREAS plaintiffs have filed an unopposed motion to withdraw from that
4 agreement;

5 WHEREAS the parties seek a schedule for proceedings on class certification and other
6 aspects of litigation of this matter;

7 It is hereby stipulated by plaintiffs Ana Ramirez, Ismael Ramirez, and
8 Jorge Salazar and defendant GreenPoint Mortgage Funding, Inc., through their respective
9 counsel, as follow:

10 1. The stay of the litigation schedule entered on September 11, 2009 [Docket No.
11 139] shall be vacated.

12 2. The Proposed Schedule For Further Proceedings attached hereto as Exhibit A
13 shall be adopted by the Court.

14 DATED: February 10, 2010

RODDY KLEIN & RYAN
CHAVEZ & GERTLER LLP
MILLER LAW LLC
NATIONAL CONSUMER LAW CENTER
BONNETT, FAIRBOURN, FRIEDMAN &
BALINT, P.C.

19
20 /s/ Gary Klein _____

21 Gary Klein
22 *Attorneys for Plaintiffs*

23 DATED: February 10, 2010

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

25 /s/ Anand S. Raman _____

26 Anand S. Raman (admitted *pro hac vice*)
27 1440 New York Avenue, N.W.
28 Washington, D.C. 20005
Telephone: 202-371-7000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Facsimile: 202-393-5760
Raoul D. Kennedy (CA SBN 40892)
Four Embarcadero Center, Suite 3800
San Francisco, California 93111-3133
Telephone: (415) 984-6400
Facsimile: 415-984-2698

Attorneys for Defendant

Additional counsel for plaintiffs:

MILLER LAW LLC
Marvin A. Miller
Lori A. Fanning (To be admitted *Pro Hac Vice*)
115 South LaSalle Street, Suite 2910
Chicago, IL 60603
Tel: (312) 332-3400

NATIONAL CONSUMER LAW CENTER
Stuart T. Rossman (To be admitted *Pro Hac Vice*)
Charles Delbaum (To be admitted *Pro Hac Vice*)
77 Summer Street, 10th Flr.
Boston, MA 02141
Tel: (617) 542-8010
Fax: (617) 542-8028

CHAVEZ & GERTLER LLP
Mark A. Chavez (CA SBN 90858)
Nance F. Becker (CA SBN 99292)
Dan Gildor (CA SBN 223027)
42 Miller Avenue
Mill Valley, California 94941
Tel: (415) 381-5599
Fax: (415) 381-5572

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February 11, 2010



The Honorable _____
United States District Court

EXHIBIT A

EXHIBIT A – Proposed Schedule

Pretrial or Trial Event	Requested Deadline
Motion for Class Certification	March 1, 2010
Response to Motion for Class Certification	April 15, 2010
Plaintiffs' Reply on Motion for Class Certification	May 17, 2010
Expert Discovery on Merits	Parties meet and confer following resolution of class certification motion
Last day for hand-serving motions and filings (other than Motions in Limine)	Parties meet and confer following resolution of class certification motion
Non-Expert Discovery Cut-Off Date	Parties meet and confer following resolution of class certification motion
Parties to meet and confer to prepare joint final pretrial conference statement and proposed order and coordinated submission of trial exhibits and other material	Parties meet and confer following resolution of class certification motion
Filing Joint Pretrial Conference Statement and Proposed Order	Parties meet and confer following resolution of class certification motion
Lodging exhibits and other trial materials	Parties meet and confer following resolution of class certification motion
Last day to serve and file briefs on disputed issues of law, including procedural and evidentiary issues	Parties meet and confer following resolution of class certification motion
Serve and file requested <i>voir dire</i> , jury instructions and forms of verdict	Parties meet and confer following resolution of class certification motion
Serve and file statements designating deposition excerpts, form interrogatory answers and responses to requests for admission to be offered at trial other than for impeachment or rebuttal	Parties meet and confer following resolution of class certification motion
Last day to meet and confer regarding objections to evidence	Parties meet and confer following resolution of class certification motion
Final Pretrial Conference and Hearing on Motions in Limine	Parties meet and confer following resolution of class certification motion
Trial Date	Parties meet and confer following resolution of class certification motion