

1 RAOUL D. KENNEDY (Bar No. 40892)
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
 2 Four Embarcadero Center, Suite 3800
 San Francisco, California 94111-4144
 3 Telephone: (415) 984-6400
 Facsimile: (415) 984-2698
 4 Email: Raoul.Kennedy@skadden.com

5 ANAND S. RAMAN (admitted *pro hac vice*)
 AMANDA M. RAINES (admitted *pro hac vice*)
 6 COLIN D. FORBES (admitted *pro hac vice*)
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
 7 1440 New York Avenue N.W.
 Washington, D.C. 20005-2111
 8 Telephone: (202) 371-7000
 Facsimile: (202) 393-5760
 9 Email: Anand.Raman@skadden.com

10 Counsel for Defendant
 GREENPOINT MORTGAGE FUNDING, INC.

11 *[Additional counsel appear on signature page.]*

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

17 ANA RAMIREZ and ISMAEL RAMIREZ, on)	No. C 08-00369 TEH
behalf of themselves and all others similarly)	
18 situated,)	<u>CLASS ACTION</u>
)	
19 Plaintiffs,)	JOINT STIPULATION AND [PROPOSED]
)	ORDER FOR EXTENSION OF CLASS
20 vs.)	CERTIFICATION DEADLINES
)	
21 GREENPOINT MORTGAGE FUNDING,)	Judge: Honorable Thelton E. Henderson
INC.,)	
)	Expedited Treatment Requested
24 Defendant.)	
25)	

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 28 JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF CLASS CERTIFICATION
 DEADLINES, *Case No. C08-00369TEH*

1 Pursuant to Civil Local Rules 6-2 and 7-12, Defendant GreenPoint Mortgage Funding,
2 Inc. and Plaintiffs Ana Ramirez, Ismael Ramirez, and Jorge Salazar (collectively, the "Parties")
3 hereby respectfully request that this Court extend the deadlines for the Parties to file their
4 respective class certification papers by fourteen days. The current briefing schedule was set by
5 Court Order [Docket No. 155].

6 In support of this Motion, the Parties represent that they have been diligently working to
7 complete discovery relevant to class certification. Depositions of the Plaintiffs are scheduled for
8 March 16, 2010, March 17, 2010, and March 23, 2010, which were the earliest dates the
9 Plaintiffs were available.

10 A brief extension of time for the filing of the Parties' class certification papers is
11 necessary in the interests of the efficient administration of justice, and to ensure a fair and
12 orderly completion of class discovery and sufficient time for briefing regarding class
13 certification.

14 A proposed Order is attached.

15 DATED: February 24, 2010

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

17 /s/ Anand S. Raman

Anand S. Raman (admitted *pro hac vice*)
Amanda M. Raines (admitted *pro hac vice*)
Colin D. Forbes (admitted *pro hac vice*)
1440 New York Avenue, N.W.
Washington, DC 20005
Telephone: (202) 371-7000
Fax: (202) 393-5760

22 Raoul D. Kennedy (CA SBN 40892)
Four Embarcadero Center, Suite 3800
San Francisco, California 93111-6400
Telephone: (415) 984-6400
Fax: (415) 984-2698

Attorneys for Defendant

1 DATED: February 24, 2010

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

6 /s/ Gary Klein
7 Gary Klein
8 Attorneys for Plaintiffs

9 ***Counsel for Plaintiffs:***

10 BONNETT, FAIRBOURN, FRIEDMAN
11 & BALINT, P.C.
12 Andrew S. Friedman (admitted *pro hac vice*)
13 Wendy J. Harrison (CA SBN 151090)
14 2901 North Central Avenue, Suite 1000
15 Phoenix, Arizona 85012
16 Tel: (602) 274-1100
17 Fax: (602) 274-1199

RODDY KLEIN & RYAN
Gary Klein (admitted *pro hac vice*)
Shennan Kavanagh
727 Atlantic Avenue
Boston, MA 02111-02810
Telephone: 617-357-5500, ext. 15
Facsimile: 617-357-5030

16 MILLER LAW LLC
17 Marvin A. Miller
18 Lori A. Fanning (admitted *Pro Hac Vice*)
19 115 South LaSalle Street, Suite 2910
20 Chicago, IL 60603
21 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

21 CHAVEZ & GERTLER LLP
22 Mark A. Chavez (CA SBN 90858)
23 Nance F. Becker (CA SBN 99292)
24 Dan Gildor (CA SBN 223027)
25 42 Miller Avenue
26 Mill Valley, California 94941
27 Tel: (415) 381-5599
28 Fax: (415) 381-5572

~~PROPOSED~~ ORDER

Upon the stipulation of the Parties, and good cause appearing, the below schedule is adopted by the Court:

Pretrial or Trial Event	Requested Deadline
Motion for Class Certification	March 15, 2010
Response to Motion for Class Certification	April 29, 2010
Plaintiffs' Reply on Motion for Class Certification	May 31, 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

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Pretrial or Trial Event	Requested Deadline
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

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Plaintiffs' motion for class certification shall be heard on June 28, 2010, at 10:00 AM, unless otherwise ordered.

Dated: 02/25/10

Hon. Thelton E. Henderson
United States District Court

