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6 Attorneys for Defendants
WELLS FARGO & CO. and WELLS
7 FARGO BANK, N.A. (erroneously sued as
WELLS FARGO HOME MORTGAGE,
8 INC.)

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 GREGORY YOUNG; ODETTA YOUNG;
EDWARD HUYER and CONNIE HUYER,
14 on behalf of themselves and all others
similarly situated,

15 Plaintiffs,

16 vs.

17 WELLS FARGO & CO., and WELLS
18 FARGO HOME MORTGAGE, INC.,

19 Defendants.
20

Case No.: CV 083735 SI

**STIPULATION AND [PROPOSED]
ORDER SETTING HEARING ON
DEFENDANTS' MOTION FOR A
PROTECTIVE ORDER**

21 Plaintiffs Gregory and Odetta Young and Edward and Connie Hoyer ("Plaintiffs") bring
22 this action on behalf of a putative nationwide class.

23 Defendants Wells Fargo & Co. and Wells Fargo Home Mortgage, Inc. ("defendants")
24 have moved to transfer venue to the Southern District of Iowa and, alternatively, to dismiss and
25 strike the complaint. The Court has set the hearing for these motions on December 19, 2008.

26 The Court has also set the Initial Case Management Conference for December 19, 2008.

27 Accordingly, the deadline for the Parties to exchange their Rule 26(a) initial disclosures is
28

1 December 12, 2008.

2 On November 26, 2008, Defendants moved for a protective order to stay discovery and
3 defer the exchange of initial disclosures pending the Court’s decision on their motions to transfer
4 and dismiss. Defendants have also moved for an order shortening time so that their motion for a
5 protective order could be heard on December 12, 2008, the deadline for the exchange of initial
6 disclosures.

7 WHEREFORE, the Parties, by and through their respective counsel, having met and
8 conferred, agree and hereby stipulate as follows:

9 1. The hearing on defendants’ motion for a protective order shall be set for
10 December 19, 2008, to coincide with the hearing on the motions to transfer and dismiss.
11 Plaintiffs will file their opposition to defendants’ motion for a protective order on or before
12 December 9, 2008. Defendants shall file their reply on or before December 11, 2008.

13 2. The deadline for the Parties to exchange their Rule 26(a) initial disclosures will be
14 continued until such time as the Court may determine after considering defendants’ motion for a
15 protective order.

16 This Stipulation is without prejudice to the rights, claims, arguments and defenses of all
17 parties. Defendants obtained from plaintiffs one 30 day extension to respond to the complaint;
18 otherwise, there have been no prior requests to modify any deadlines set by the Court. A hearing
19 on shorten time for defendants’ motion for a protective order will have little or no effect on the
20 case schedule.

21 DATED: December 2, 2008

REESE RICHMAN LLP

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23

By: _____ /s/
Michael R. Reese

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Attorneys for Plaintiffs
GREGORY YOUNG, ODETTA YOUNG and
EDWARD HUYER, CONNIE HUYER

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DATED: December 2, 2008

SEVERSON & WERSON
A Professional Corporation

By: _____ /s/
Joshua E. Whitehair

Attorneys for Defendants
WELLS FARGO & CO. and WELLS FARGO
BANK, N.A. (erroneously sued as "WELLS
FARGO HOME MORTGAGE, INC.)

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:



United States District Court Judge

CERTIFICATE OF SERVICE

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of San Francisco, California; my business address is Severson & Werson, One Embarcadero Center, Suite 2600, San Francisco, CA 94111.

On the date below I served a copy, with all exhibits, of the following document(s):

STIPULATION AND [PROPOSED] ORDER SETTING HEARING ON DEFENDANTS' MOTION FOR A PROTECTIVE ORDER

on all interested parties in said case addressed as follows:

J. Preston Strom
Strom Law Firm, L.L.C.
2110 Beltline Blvd., Suite A
Columbia, SC 29204

Mario A. Pacella
Strom Law Firm, LLC
2110 Beltline Boulevard, Suite A
Columbia, SC 29204

(BY MAIL) By placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in San Francisco, California in sealed envelopes with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. This declaration is executed in San Francisco, California, on December 2, 2008.

/s/ Marilyn C. Li
Marilyn C. Li