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8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

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MICHAEL E. MOORE and DIANE M. ROONEY, individually and on behalf of all others similarly situated,
 Plaintiffs,
 vs.
 CHASE BANK USA, N.A.,
 Defendant.

) Case No. CV 09-0348-MMC
)
) [Assigned to the Hon. Maxine M. Chesney]
)
) **STIPULATION AND [Proposed] ORDER**
) **TO EXTEND TIMES**
)
) AND ORDER THEREON
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)
)

1 WHEREAS, on January 26, 2009, plaintiffs Michael E. Moore and Diane M. Rooney
2 (together, “Plaintiffs”) filed the initial Class Action Complaint;

3 WHEREAS, on February 9, 2009, Plaintiffs filed a First Amended Class Action Complaint
4 (the “Amended Complaint”);

5 WHEREAS, the response of defendant Chase Bank USA, N.A. (“Chase”) to the Amended
6 Complaint currently is due on or before March 16, 2009;

7 WHEREAS, the Court, in its Order Setting Initial Case Management Conference and ADR
8 Deadlines, dated January 26, 2009 (“Initial Case Management Order”), scheduled the initial Case
9 Management Conference in this case for May 8, 2009 at 10:30 a.m., and further set certain
10 deadlines in April and May 2009 in connection with the initial Case Management Conference
11 (“Corresponding Deadlines”);

12 WHEREAS, multiple similar class actions are currently pending in this District and in other
13 federal district courts around the country and a Motion for Transfer and Coordination pursuant to
14 28 U.S.C. § 1407 (the “MDL Motion”) has been filed with the Judicial Panel on Multidistrict
15 Litigation (the “JPML”) and docketed as In Re: Chase Bank USA, N.A., “Check Loan” Contract
16 Litigation, MDL No. 2032;

17 WHEREAS, responses to the MDL Motion are due by March 16, 2009, any reply is due by
18 March 23, 2009, and the JPML will thereafter schedule a hearing date;

19 WHEREAS, in light of the foregoing, the parties have agreed to an extension of the time for
20 Chase to respond to the Amended Complaint, and to continue the initial Case Management
21 Conference and Corresponding Deadlines set by the Court in its Initial Case Management Order,
22 while the MDL Motion is pending;

23 WHEREAS, pursuant to Local Rule 6-1(a) parties may agree to a extension of time within
24 which to answer or otherwise respond to a compliant, provided the change will not alter the date of
25 any event or any deadline already fixed by Court Order;

26 WHEREAS, pursuant to Local Rules 6-1(b) and 6-2, the parties may request by stipulation
27 an order altering dates and deadlines previously fixed by the Court;

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