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8
9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA—SAN FRANCISCO DIVISION

11
 12 GUSTAVO REYES and MARIA TERESA
 GUERRERO, husband and wife, individually
 13 and on behalf of others similarly situated,

14 Plaintiffs,

15 vs.

16 WELLS FARGO BANK, N.A., a national
 bank; and DOES 1-100, inclusive,

17 Defendants.
18

Case No. 3:10-cv-01667-JCS

**STIPULATION AMENDING
 SETTLEMENT AGREEMENT IN
 SUPPORT OF PRELIMINARY
 APPROVAL OF CLASS SETTLEMENT**

Hearing Date: April 19, 2013
 Time: 9:30 a.m.
 Judge: Hon. Joseph C. Spero
 Trial Date: None Set

19
 20 IT IS HEREBY STIPULATED, by and between plaintiffs Gustavo Reyes and Maria
 21 Teresa Guerrero and defendant Wells Fargo Bank, N.A. (the“Parties”), that paragraph B.1.b (p.4) of
 22 the Class Action Settlement Agreement And Release (the“Agreement”) [Dkt. No. 136-1] is hereby
 23 amended to read, in its entirety, as follows:

24 For purposes of this paragraph, “Settled Claims” means and includes any and all
 25 claims, actions, causes of action, offsets or liabilities, whether known or
 26 unknown, suspected or unsuspected, contingent or matured, which Plaintiffs or
 27 any member of the Settlement Class has had, now has, or may in the future have,
 arising from or relating to the special forbearance agreements and offer letters
 28 substantially similar to those sent to Plaintiffs (attached hereto as Exhibit A) that
 were sent to any such member of the Settlement Class between March 12, 2009
 and October 31, 2012. Excluded from this release are all claims for actual,
 economic damages (other than trial plan payments).

