Case3:10-cv-01667-JCS Document45 Filed01/24/11 Page1 of 2

MICHAEL J. STEINER (State Bar No. 112079) 1 JOSHUA E. WHITEHAIR (State Bar No. 244900) 2 **SEVERSON & WERSON** A Professional Corporation 3 One Embarcadero Center, Suite 2600 San Francisco, CA 94111 Telephone: (415) 398-3344 4 Facsimile: (415) 956-0439 5 mjs@severson.com jew@severson.com 6 7 Attorneys for Defendant WELLS FARGO BANK, N.A. 8 9 UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 **GUSTAVO REYES and MARIA TERESA** Case No.: 3:10-cv-01667-JCS GUERRERO, husband and wife, individually 12 and on behalf of others similarly situated, STIPULATION AND (PROPOSED) ORDER FOR EXTENSION OF TIME Plaintiffs, AS TO DISCOVERY AND FILING 13 DEADLINE FOR CLASS 14 **CERTIFICATION MOTION** VS. WELLS FARGO BANK, N.A., a national 15 bank; and DOES 1-100, inclusive, 16 Defendants. 17 18 WHEREAS, the Court has previously approved two stipulations continuing the deadline for 19 Defendant to serve supplemental responses to Plaintiffs' first set of written discovery while the Court 20 considered and decided Defendant's motion to dismiss the First Amended Complaint ("FAC") and so 21 as to permit Defendant sufficient time to conduct a reasonably diligent search for responsive 22 information and documents; 23 WHEREAS, the prior stipulations have also extended the deadline for Plaintiffs to file and 24 serve their motion for class certification to afford Plaintiffs sufficient time to conduct class discovery 25 following receipt of Defendant's supplemental responses; 26 WHEREAS, on January 3, 2011, the Court entered an order granting in part and denying in part 27 Defendant's motion to dismiss the FAC; 28 WHEREAS, Defendant reports that it made significant progress in searching for responsive

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Stipulation and Proposed Order Extending Deadlines

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