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15 Attorneys for Defendant
 Wells Fargo Bank, N.A.

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA

19 CHARLES P. HAGGARTY and GINA M.
 HAGGARTY, on behalf of themselves and all
 20 others similarly situated,

21 Plaintiffs,

22 vs.

23 WELLS FARGO BANK, N.A.,

24 Defendant.

Case No.: 3:10-cv-02416-CRB

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO CONTINUE EXPERT WITNESS
 DEADLINES**

First Amended
 Complaint Filed: November 5, 2010

Honorable Charles R. Breyer
 Honorable Jacqueline Scott Corley

REED SMITH LLP
 A limited liability partnership formed in the State of Delaware

1 Pursuant to Civil L. R. 7-12, Plaintiffs CHARLES P. HAGGARTY and GINA M.
 2 HAGGARTY, and Defendant WELLS FARGO BANK, N.A., having met and conferred through
 3 their counsel of record, submit this Joint Stipulation and Proposed Order concerning changes to the
 4 expert witness deadlines in this matter.

5 RECITAL

6 WHEREAS, the following dates are currently scheduled in this matter:

- | | | | |
|----|----|--|--------------------|
| 7 | 1. | Trial Date | December 3, 2012 |
| 8 | 2. | Pre-Trial Conference | November 27, 2012 |
| 9 | 3. | Hearing on Motion for Class Certification | September 28, 2012 |
| 10 | 4. | Hearing on Motion for
Judgment on the Pleadings | August 31, 2012 |
| 11 | 5. | Fact Discovery Cutoff: | August 22, 2012 |
| 12 | 6. | Initial Expert Disclosures: | August 31, 2012 |
| 13 | 7. | Rebuttal Expert Disclosures: | September 14, 2012 |
| 14 | 8. | Expert Discovery Cutoff: | September 28, 2012 |

15 WHEREAS, the parties are currently engaged in discovery and have agreed that that it is the
 16 parties' best interests and the interests of judicial economy to extend the expert witness deadlines in
 17 this matter.

18 STIPULATION

19 THEREFORE, the parties agree through their respective attorneys that expert witness
 20 deadlines currently in place shall be extend by 14 days, as follows:

21 **Parties' Proposed Changes To Expert Witness Deadlines**

- | | <u>Present Date</u> | <u>Proposed Date</u> |
|----|------------------------------------|----------------------|
| 22 | | |
| 23 | | |
| 24 | 1. Initial Expert Disclosures: | August 31, 2012 |
| 25 | At the time of disclosure, the | September 14, 2012 |
| 26 | disclosing party will provide | |
| 27 | 3 dates between Sept. 14-Sept. 28, | |
| 28 | 2012 that the disclosed expert | |
| | is available for deposition. | |
| | 2. Rebuttal Expert Disclosures: | September 14, 2012 |
| | At the time of disclosure, the | September 28, 2012 |
| | disclosing party will provide | |

3 dates between Sept. 28-Oct. 12,
2012 that the disclosed expert
is available for deposition.

3. Expert Discovery Cutoff: September 28, 2012 October 12, 2012

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: August 3, 2012

Respectfully submitted
McCUNE WRIGHT, LLP

By: /s/ Richard D. McCune
Richard D. McCune

Attorney for Plaintiffs
Charles P. Haggarty and Gina M. Haggarty.

Dated: August 3, 2012

REED SMITH, LLP

By: /s/ Jack R. Nelson
Jack R. Nelson

Attorneys for Defendant
Wells Fargo Bank, N.A.

PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATE: August 6, 2012

Honorable Charles R. Breyer
United States District Court



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