1 2	Steve W. Berman (Pro Hac Vice) Thomas E. Loeser (Cal. Bar No. 202724) HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300	Matthew G. Ball (SBN: 208881) matthew.ball@klgates.com K&L GATES LLP Four Embarcadero Center, Suite 1200
3	Seattle, WA 98101 Telephone: (206) 623-7292	San Francisco, CA 94111 Tel.: (415) 882-8200
4	Facsimile: (206) 623-0594 steve@hbsslaw.com	Fax: (415) 882-8220
5	toml@hbsslaw.com	Irene C. Freidel (<i>pro hac vice</i>) irene.freidel@klgates.com
6	Peter B. Fredman (Cal. Bar No. 189097) LAW OFFICE OF PETER FREDMAN PC	David Christensen (<i>pro hac vice</i>) david.christensen@klgates.com
7	125 University Ave, Suite 102 Berkeley, CA 94710	Jennifer J. Nagle (pro hac vice) jennifer.nagle@klgates.com
8	Telephone: (510) 868-2626 Facsimile: (510) 868-2627	K&L GATES LLP State Street Financial Center
9	peter@peterfredmanlaw.com	One Lincoln Street Boston, MA 02111-2950
10	Attorneys for Plaintiff AMIRA JACKMON	Tel.: (617) 261-3100 Fax: (617) 261-3175
11	and persons similarly situated	,
12		Attorneys for Defendant WELLS FARGO BANK, N.A.
13	Timothy G. Blood (Cal. Bar No. 149343) Thomas J. O'Reardon II (Cal. Bar No. 247952)	Brian R. Strange (Cal. Bar No. 103252) lacounsel@earthlink.net
14	BLOOD HURST & O'REARDON LLP 600 B. Street, Suite 1550	STRANGE & CARPENTER 12100 Wilshire Blvd, Suite 1900
15	San Diego, CA 92101 Telephone: (619) 338-1100	Los Angeles, CA 90025 Telephone: (310) 207-5055
16	Facsimile: (619) 338-1101 tblood@bholaw.com	Facsimile: (310) 8263210
17	toreardon@bholaw.com	Attorneys for Plaintiffs KAREN LUCIA,
18	Attorneys for Plaintiff PHILLIP R. CORVELLO,	JEFFREY LUCIA, and GAIL CAPLAN, and persons similarly situated
19	and persons similarly situated	
20		S DISTRICT COURT
21	NORTHERN DISTR	RICT OF CALIFORNIA
22	KAREN LUCIA and JEFFREY LUCIA, individually, and on behalf of others	Case No. 3:10-cv-04749-VC
23	similarly situated,	CLACCACTION
24	Plaintiffs,	<u>CLASS ACTION</u>
25	v. WELLS FARGO BANK, N.A. d/b/a	STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINES
26	WELLS FARGO HOME MORTGAGE;	PURSUANT TO LOCAL RULE 79-5
27	and DOES 1 through 10,	
28	Defendants.	Hon, Vince Chhabria

1 2	PHILLIP R. CORVELLO, individually, and on behalf of others similarly situated,	Case No. 10-cv-05072-VC	
3	Plaintiff,		
4	v.		
5	WELLS FARGO BANK, N.A. d/b/a WELLS FARGO HOME MORTGAGE		
6	d/b/a AMERICA'S SERVICING COMPANY,		
7 8	Defendant.		
9 10	AMIRA JACKMON, individually, and on behalf of others similarly situated,	Case No. 11-cv-03884-VC	
11	Plaintiff,		
12	V.		
13	AMERICA'S SERVICING COMPANY and WELLS FARGO BANK, N.A.,		
14 15	Defendants.		
16	TO THE HONORABLE VINCE CHHABRIA, UNITED STATES DISTRICT JUDGE,		
17	PLAINTIFFS KAREN AND JEFFREY LUCIA, GAIL CAPLAN, PHILLIP R. CORVELLO, AND		
18	AMIRA JACKMON, THEIR COUNSEL OF RECORD, AND ALL OTHER INTERESTED		
19	PARTIES:		
20	PLEASE TAKE NOTICE that pursuant to Civ. L.R. 6-1(b), 6-2, and 7-12, plaintiffs Karen		
21	Lucia, Jeffrey Lucia, Gail Caplan, Phillip R. Corvello, and Amira Jackmon ("plaintiffs") and		
22	defendant Wells Fargo Bank, N.A. ("Wells Fargo") (collectively, the "Parties"), by and through their		
23	respective counsel, stipulate and agree as follows:		
24	WHEREAS, the Court entered a Scheduling Order in these cases on February 11, 2015 (Dck		
25	No. 118) ("Scheduling Order"); and		
26	WHEREAS, the Scheduling Order requires plaintiffs to file their motion(s) for class		
27	certification by July 2, 2015; and		
28	WHEREAS, plaintiffs may submit certain documents, testimony, or other information in		

STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINES PURSUANT TO LOCAL RULE 79-5 Case Nos. 10-cv-04749-VC; 10-cv-05072-VC; 11-cv-03884-VC

support of their motions for class certification that have otherwise been designated as confidential by Wells Fargo or plaintiffs pursuant to the respective protective orders entered in the cases; and

WHEREAS, Local Rule 79-5 requires that plaintiffs file such documents, testimony, or other information in reducted form, and file accompanying administrative motion(s) to seal; and

WHEREAS, Local Rule 79-5 further requires that Wells Fargo submit a response (or responses) to the Court in support of sealing within 4 days of the filing of plaintiffs' administrative motion(s) to seal; and

WHEREAS, because plaintiffs' deadline for filing their motions for class certification falls directly before the federal Fourth of July holiday (on July 2, 2015), and in order to provide Wells Fargo with adequate time to evaluate the material filed by plaintiffs and prepare, as necessary, declarations in support of sealing, the Parties have conferred and agreed upon extending the deadline for plaintiffs to file their respective administrative motions to seal, if any, and the deadline for Wells Fargo to respond to same; and

WHEREAS, the Parties agree that no party will be prejudiced and no other deadlines will be affected by the extension.

IT IS HEREBY STIPULATED AND AGREED by the Parties as follows:

- 1. Plaintiffs' deadline to file their administrative motion(s) to seal, if any, pursuant to Local Rule 79-5 ("Administrative Motion(s)") is extended through and until July 8, 2015.
- 2. Wells Fargo's deadline to submit its response(s) to the Administrative Motion(s) is extended through and until July 22, 2015.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1	Peter B. Fredman (w/permission)	Irene C. Freidel
2	Thomas E. Loeser	Matthew G. Ball
3	HAGENS BERMAN SOBOL SHAPIRO	Irene C. Freidel (<i>pro hac vice</i>) David D. Christensen (<i>pro hac vice</i>)
	Peter B. Fredman	Jennifer J. Nagle (pro hac vice)
4	LAW OFFICE OF PETER FREDMAN PC	K&L GATES LLP
5	Counsel for Plaintiff AMIRA JACKMON	Counsel for Defendant
6		WELLS FARGO BANK, N.A.
7		
8	_Timothy G. Blood (w/permission)	Brian Strange (with permission)
9	Timothy G. Blood Thomas J. O'Reardon II	Brian Strange STRANGE & CARPENTER
	BLOOD HURST & O'REARDON LLP	STRANGE & CARPENTER
10	Counsel for Plaintiff	Counsel for Plaintiffs
11	PHILLIP R. CORVELLO	KAREN and JEFFREY LUCIA and GAIL
12		CAPLAN
13		
14	Dated: June 22, 2015	
15		
16		
17	I IDENE C EDEIDEL om the ECE Hear	whose ID and password are being used to file this
18	document and, in compliance with Local Rule 5-	1(i)(3), hereby attest that all signatories concur with
19	this filing.	
20		Irene C. Freidel
21		Irene C. Freidel
22		
23		
24		
25		
26		
27		
28		

PURSUANT TO STIPULATION, IT IS SO ORDERED. DATED: June 23, 2015 Hon. Vince Chhabria United States District Judge