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Attorneys for Plaintiffs KAREN LUCIA and
JEFFREY LUCIA and persons similarly
situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KAREN LUCIA and JEFFREY LUCIA,
 individually, and on behalf of others
 similarly situated,
 Plaintiffs,
 v.
 WELLS FARGO BANK, N.A. d/b/a
 WELLS FARGO HOME MORTGAGE;
 and DOES 1 through 10,
 Defendants.

Case No. 3:10-cv-04749-VC

CLASS ACTION

**STIPULATION AND [PROPOSED]
 SCHEDULING ORDER**

Hon. Vince Chhabria

1 PHILLIP R. CORVELLO, individually,
2 and on behalf of others similarly situated,
3 Plaintiff,

Case No. 10-cv-05072-VC

4 v.

5 WELLS FARGO BANK, N.A. d/b/a
6 WELLS FARGO HOME MORTGAGE
7 d/b/a AMERICA'S SERVICING
8 COMPANY,

Defendant.

9 AMIRA JACKMON, individually, and on
10 behalf of others similarly situated,

Case No. 11-cv-03884-VC

11 Plaintiff,

12 v.

13 AMERICA'S SERVICING COMPANY
14 and WELLS FARGO BANK, N.A.,

15 Defendants.

16 TO THE HONORABLE VINCE CHHABRIA, UNITED STATES DISTRICT JUDGE,
17 PLAINTIFFS KAREN AND JEFFREY LUCIA, PHILLIP R. CORVELLO, AND AMIRA
18 JACKMON, THEIR COUNSEL OF RECORD, AND ALL OTHER INTERESTED PARTIES:

19 PLEASE TAKE NOTICE that pursuant to the Court's February 3, 2015 Order, Plaintiffs
20 Karen and Jeffrey Lucia ("Lucia"), Phillip R. Corvello ("Corvello"), and Amira Jackmon
21 ("Jackmon") (collectively, "Related Plaintiffs"), and Defendant Wells Fargo Bank, N.A. ("Wells
22 Fargo") (collectively, the "Parties"), by and through their respective counsel, stipulate and agree as
23 follows:

24 WHEREAS, the Court held a case management conference in these related actions on
25 February 3, 2015; and

26 WHEREAS, the Court has ordered that any motion(s) for class certification to be filed by the
27 Related Plaintiffs must be heard by the Court by no later than October 29, 2015; and

1 WHEREAS, the Court instructed the Parties in its February 3, 2015 Order to file a joint
2 stipulation setting out such further deadlines as the Parties have agreed upon for completion of
3 discovery and briefing on class certification; and

4 WHEREAS, the Parties have conferred and agreed upon certain deadlines for the completion
5 of discovery and briefing on class certification.

6 **IT IS HEREBY STIPULATED AND AGREED** by the Parties that:

7 1. Counsel for Jackmon will propose consolidated ESI terms and custodians to the
8 existing draft protocol previously negotiated between counsel for Wells Fargo, Lucia, and Corvello
9 by **February 13, 2015**;

10 2. Wells Fargo will make its best effort to respond to such proposal by **February 20,**
11 **2015**;

12 3. The Parties shall finalize one ESI protocol to govern each of the three cases by
13 **February 27, 2015**;

14 4. Wells Fargo will make its best effort to complete rolling ESI productions pursuant to
15 the agreed upon protocol by **April 10, 2015**;¹

16 5. All pre-certification fact discovery, including fact depositions, will be completed by
17 **June 5, 2015**;

18 6. Related Plaintiffs will disclose the identities and curriculum vitae of any experts they
19 intend to use in support of class certification by **June 19, 2015**;²

20 7. Related Plaintiffs will file their motion(s) for class certification by **July 2, 2015**;

21 8. Wells Fargo will disclose the identities and curriculum vitae of any experts it intends
22 to use in support of its opposition(s) to class certification by **August 14, 2015**;³

23
24 ¹ Wells Fargo will produce a privilege log within two weeks of completing its rolling ESI
25 productions.

26 ² Related Plaintiffs agree that they will make such expert(s), if any, available for deposition
27 within three weeks after filing their brief(s) in support of class certification, on a date to be mutually
28 agreed upon by the Parties.

³ Wells Fargo agrees that it will make such expert(s), if any, available for deposition within
three weeks after filing its brief(s) in opposition to class certification, on a date to be mutually agreed
upon by the Parties.

1 9. Wells Fargo will file its opposition(s) to class certification by **August 28, 2015**;

2 10. Related Plaintiffs will file their reply(ies) in support of class certification by **October**
3 **9, 2015**.

4 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

5
6
7 /s/ Peter B. Fredman

8 Thomas E. Loeser
HAGENS BERMAN SOBOL SHAPIRO

9 Peter B. Fredman
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10 *Counsel for Plaintiff AMIRA JACKMON*

7 /s/ Irene C. Freidel

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13 /s/ Timothy G. Blood

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16 *Counsel for Plaintiff*
17 *PHILLIP R. CORVELLO*

13 /s/ Gretchen Carpenter

14 Gretchen Carpenter
STRANGE & CARPENTER

16 *Counsel for Plaintiffs*
17 *KAREN and JEFFREY LUCIA*

18 Dated: February 9, 2015
19
20
21

22 I, IRENE C. FREIDEL, am the ECF User whose ID and password are being used to file this
23 document and, in compliance with Local Rule 5-1(i)(3), hereby attest that all signatories concur with
24 this filing.

24 /s/ Irene C. Freidel

25 Irene C. Freidel
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February 11, 2015



Hon. Vince Chhabria
United States District Judge

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