

1 STROOCK & STROOCK & LAVAN LLP
 JULIA B. STRICKLAND (State Bar No. 83013)
 2 *jstrickland@stroock.com*
 LISA M. SIMONETTI (State Bar No. 165996)
 3 *lsimonetti@stroock.com*
 DAVID W. MOON (State Bar No. 197711)
 4 *dmoon@stroock.com*
 KRISTINA A. DEL VECCHIO (State Bar No. 283782)
 5 *kdelvecchio@stroock.com*
 2029 Century Park East, 18th Floor
 6 Los Angeles, California 90067-3086
 Telephone: 310-556-5800
 7 Facsimile: 310-556-5959
lacalendar@stroock.com

8 Attorneys for Defendants
 9 SLM CORPORATION, SALLIE MAE, INC.
 and SLM PC STUDENT LOAN TRUST 2004-A

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

13	TINA M. UBALDI, on behalf of herself and all)	Case No. 3:11-cv-01320 EDL
	others similarly situated,)	
14)	
	Plaintiff,)	STIPULATION AND PROPOSED
15)	ORDER CONTINUING HEARING AND
	v.)	BRIEFING SCHEDULE ON MOTION TO
16)	COMPEL RESPONSES TO REQUESTS
	SLM CORPORATION, d/b/a SALLIE MAE,)	FOR PRODUCTION OF DOCUMENTS
17	INC., d/b/a/ SALLIE MAE SERVICING, a)	NOS. 39-55 AS MODIFIED
	Delaware corporation,)	
18)	Action Filed: March 18, 2011
	Defendant.)	
19)	[Local Rule 6-1(b)]
20)	
)	[Declaration of Lisa M. Simonetti filed
21)	concurrently]

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 23 WHEREAS, on October 30, 2012, plaintiff Tina M. Ubaldi (“Plaintiff”) filed a
 24 Motion To Compel Responses To Requests For Production Of Documents Nos. 39-55 (“Motion”);

25 WHEREAS, the deadline for defendants SLM Corporation, Sallie Mae, Inc. and
 26 SLM PC Student Loan Trust 2004-A (“Defendants”) to file their Opposition to the Motion is
 27 currently November 13, 2012;

1 WHEREAS, Plaintiff's Reply to the Motion is currently due on November 20, 2012;
2 WHEREAS, the hearing on the Motion is currently scheduled for December 4,
3 2012;

4 WHEREAS, Defendants' counsel will be in arbitration on December 4, 2012 on
5 another matter, and the parties have agreed to continue the hearing on the Motion to Compel and to
6 adjust the briefing schedule accordingly;

7 WHEREAS, pursuant to Civil Local Rules 6-1(b) and 6-2, the parties may request
8 an order changing a deadline that involves papers required to be filed or lodged with the Court or
9 that would extend deadlines set forth in the Local Rules or Federal Rules; and

10 WHEREAS, this Stipulation is made in good faith and not for purposes of delay.

11 IT IS HEREBY STIPULATED by and between the parties, through their respective
12 counsel of record, as follows:

13 (a) The date by which Defendants must file their Opposition to the Motion is
14 continued from November 13, 2012 to November 20, 2012;

15 (b) The date by which Plaintiff must file her Reply is continued from November
16 20, 2012 to December 4, 2012;

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(c) The hearing on the Motion is continued from December 4, 2012 to
December 18, 2012 at 9:00 a.m. in Courtroom E.

Dated: November 9, 2012

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
LISA M. SIMONETTI
DAVID W. MOON
KRISTINA A. DEL VECCHIO

By: /s/ Lisa M. Simonetti
Lisa M. Simonetti

Attorneys for Defendants
SLM CORPORATION, SALLIE MAE,
INC. and SLM PC STUDENT LOAN
TRUST 2004-A

Dated: November 9, 2012

LAW OFFICES OF JANET LINDNER
SPIELBERG
JANET LINDNER SPIELBERG

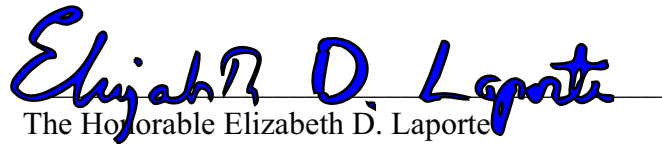
By: /s/ Janet L. Spielberg
Janet Lindner Spielberg

Attorneys for Plaintiff
TINA M. UBALDI

~~PROPOSED~~ ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED AS MODIFIED.

Dated: November 14, 2012


The Honorable Elizabeth D. Laporte

