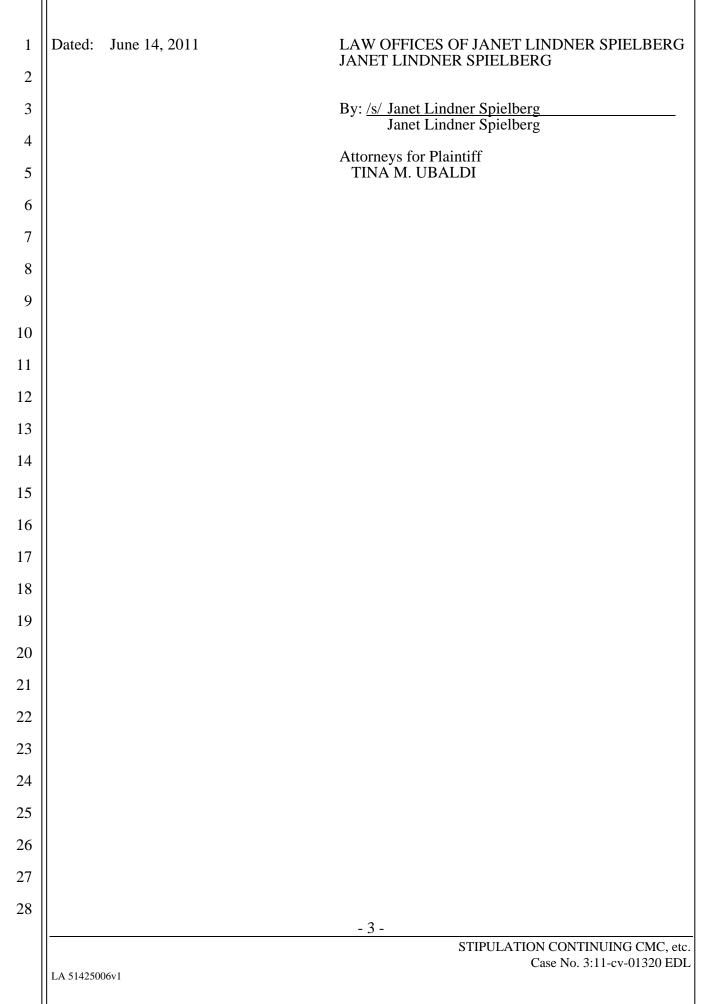
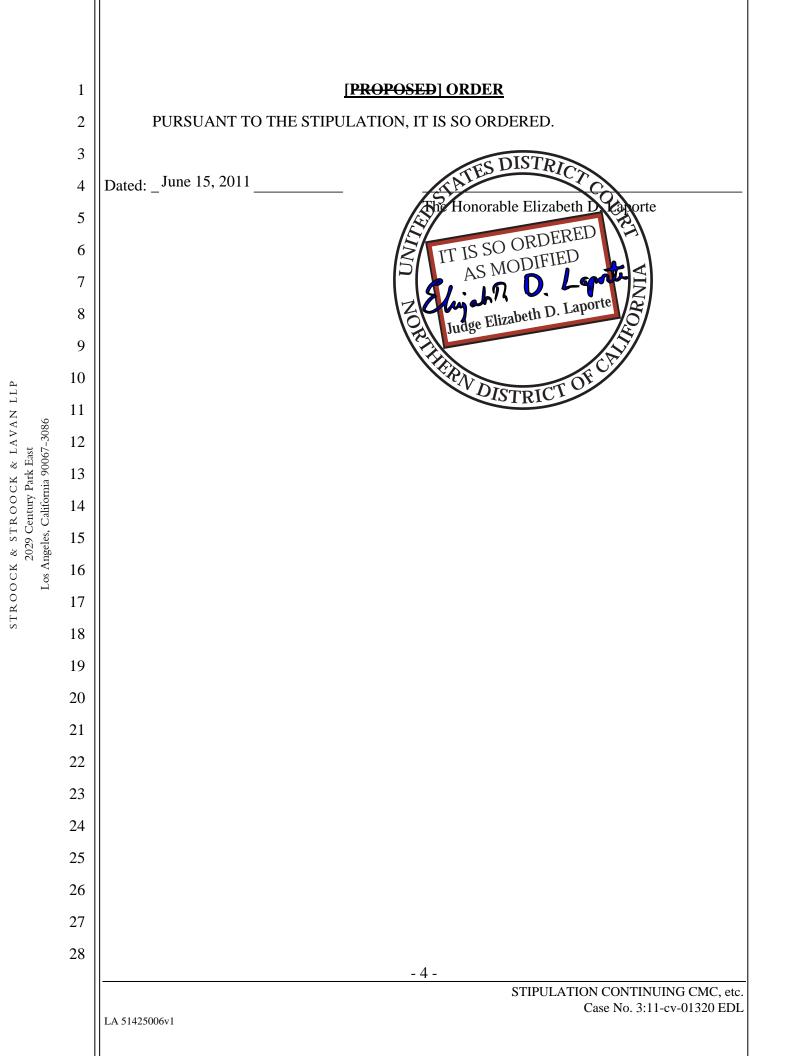
1 2 3 4 5 6 7 8	STROOCK & STROOCK & LAVAN LLP JULIA B. STRICKLAND (State Bar No. 83013) <i>jstrickland@stroock.com</i> LISA M. SIMONETTI (State Bar No. 165996) <i>lsimonetti@stroock.com</i> DAVID W. MOON (State Bar No. 197711) <i>dmoon@stroock.com</i> 2029 Century Park East, 18th Floor Los Angeles, California 90067-3086 Telephone: 310-556-5800 Facsimile: 310-556-5959 <i>lacalendar@stroock.com</i> Attorneys for Defendant SLM CORPORATION	
9	UNITED STATES	DISTRICT COURT
10	NORTHERN DISTRI	CT OF CALIFORNIA
11 12	TINA M. UBALDI, on behalf of herself and all) others similarly situated,	Case No. 3:11-cv-01320 EDL
13) Plaintiff,	STIPULATION AND [PROPOSED]
14	v.)	ORDER CONTINUING HEARING AND BRIEFING SCHEDULE ON MOTION TO
15) SLM CORPORATION, d/b/a SALLIE MAE, INC., d/b/a/ SALLIE MAE SERVICING, a	DISMISS, STAYING DISCOVERY AND CONTINUING CASE MANAGEMENT CONFERENCE AS MODIFIED
16	Delaware corporation,	[Local Rule 6-1(a)]
17	Defendant.	
18		[Declaration of David W. Moon filed concurrently]
19)	
20		
21	WHEREAS, on May 27, 2011, defendant SLM Corporation filed a Motion to Dismiss, which is set for hearing on July 12, 2011;	
22		
23	WHEREAS, due to scheduling conflicts with the current hearing date and briefing schedule,	
24	the parties have agreed to continue the hearing on	the Motion to Dismiss and to adjust the briefing
25	schedule accordingly;	
26		
27		
28		1 - STIPULATION CONTINUING CMC, etc.
	LA 51425006v1	Case No. 3:11-cv-01320 EDL
		Dockets.Justia.c

1	WHEREAS, to conserve judicial resources, the parties have further agreed to stay discovery	
2	and other proceedings until after the hearing on the Motion to Dismiss;	
3	WHEREAS, a Case Management Conference is currently set for June 27, 2011;	
4	WHEREAS, this Stipulation is made in good faith and not for purposes of delay; and	
5	WHEREAS, good cause exists for the foregoing modifications to the case schedule because	
6	it would promote judicial efficiency to stay discovery and to continue the Case Management	
7	Conference and the parties' submission of their Joint Case Management Statement until after the	
8	hearing on the motion to dismiss.	
9	IT IS HEREBY STIPULATED by and between the parties, through their respective counsel	
10	of record, as follows:	
11	(a) The hearing on the Motion to Dismiss shall be continued to September 20, 2011 at	
12	9:00 a.m. in Courtroom E;	
13	(b) Plaintiff's Opposition to the Motion shall be filed and served by August 30, 2011,	
14	and defendant's Reply shall be filed and served by September 6, 2011;	
15	(c) Pending a ruling on the Motion to Dismiss, all discovery shall be stayed;	
16 17	 (d) The Case Management Conference set for June 27, 2011 shall be continued to 10:00 a.m. November 22, 2011 at 3:00 p.m. in Courtroom E; and 	
18	(e) The parties shall complete initial disclosures or state their objections and file their	
19	Rule 26(f) Report and Joint Case Management Statement on or before November 15, 2011.	
20	Dated: June 14, 2011 STROOCK & STROOCK & LAVAN LLP	
21 22	JULIA B. STRICKLAND LISA M. SIMONETTI DAVID W. MOON	
22	By: <u>/s/ David W. Moon</u>	
24	David W. Moon	
25	Attorneys for Defendant SLM CORPORATION	
26	SLW CORFORMION	
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	- 2 - STIPULATION CONTINUING CMC, etc.	
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STROOCK & STROOCK & LAVAN LLP 2029 Century Park East Los Angeles, California 90067-3086





1	CERTIFICATION		
2	I hereby certify that, on June 14, 2011, copies of the foregoing STIPULATION		
3	CONTINUING HEARING AND BRIEFING SCHEDULE ON MOTION TO DISMISS,		
4	STAYING DISCOVERY AND CONTINUING CASE MANAGEMENT CONFERENCE		
5	were filed electronically and served by U.S. Mail on anyone unable to accept electronic filing.		
6	Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing		
7	system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of		
8	Electronic Filing. Parties may access this filing through the court's EM/ECF System.		
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10	By: /s/ Joseph A. Escarez Joseph A. Escarez		
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