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Rocky Mountain Bank and Trust*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

HEATHER NEWTON, individually and  
behalf of others similarly situated,

Plaintiff,

v.

AMERICAN DEBT SERVICES, INC., a  
California corporation; QUALITY SUPPORT  
SERVICES, LLC, a California limited liability  
company; GLOBAL CLIENT SOLUTIONS,  
LLC; ROCKY MOUNTAIN BANK AND  
TRUST; and DOES 1-100,

Defendants.

) Case No: 3:11-cv-03228-EMC

) CLASS ACTION

) **PROPOSED ORDER GRANTING**  
) **DEFENDANTS GLOBAL CLIENT**  
) **SOLUTIONS, LLC AND ROCKY**  
) **MOUNTAIN BANK & TRUST AND**  
) **PLAINTIFF HEATHER NEWTON'S**  
) **STIPULATED REQUEST FOR**  
) **EXTENSION OF TIME FOR**  
) **DEFENDANTS TO FILE THEIR**  
) **RESPECTIVE REPLY BRIEFS TO THE**  
) **PENDING MOTIONS TO DISMISS**  
) **AND REVISING BRIEFING**  
) **SCHEDULE ON PLAINTIFF'S**  
) **FORTHCOMING CLASS**  
) **CERTIFICATION MOTION**

1 THIS CAUSE having come before the Court on Plaintiff Heather Newton (“Plaintiff”)  
2 and Defendants Rocky Mountain Bank & Trust (“RMBT”) and Global Client Solutions, LLC  
3 (“Global”) (all, “Parties”) Stipulated Request for an Order permitting the Defendants a brief  
4 extension of time within which to file their respective Reply briefs to the pending Motions to  
5 Dismiss and requesting the Court to revise the briefing schedule on Plaintiff’s Renewed Motion  
6 for Class Certification, it is now thereupon,

7 PURSUANT TO STIPULATION, IT IS SO ORDERED:

- 8 1. The Parties’ Stipulation is GRANTED.
- 9 2. The deadline for RMBT and Global to file and serve their respective Reply briefs in  
10 support of their respective Motions to Dismiss is extended up through and including  
11 **December 16, 2013**;
- 12 3. Plaintiff shall have up through and including **April 10, 2014**, in which to file her  
13 motion for class certification;
- 14 4. Defendants Global and RMBT shall have up through and including **April 24, 2014**, in  
15 which to file their respective responses to Plaintiff’s motion for class certification;
- 16 5. Plaintiff shall have up to and including **May 1, 2014**, in which to file her reply brief  
17 in support of her motion for class certification.
- 18 6. The hearing scheduled for March 13, 2014 on Plaintiff’s renewed motion for class  
19 certification is rescheduled for **May 15, 2014** at 1:30 p.m.

20 DONE AND ORDERED in Chambers, at San Francisco, California, on this  
21 9<sup>th</sup> day of December, 2013.

