

RICHARD W. EPSTEIN (FLA. BAR NO: 229091)

(Pro Hac Vice Admission)

Richard.Epstein@gmlaw.com

REBECCA F. BRATTER (FLA. BAR NO: 0685100)

(Pro Hac Vice Admission)

Rebecca.Bratter@gmlaw.com

MEREDITH H. LEONARD (FLA. BAR NO: 69535)

(Pro Hac Vice Admission)

Meredith.Leonard@gmlaw.com

GREENSPOON MARDER, P.A.
200 E. Broward Blvd., Suite 1500

Ft. Lauderdale, FL 33301

954-491-1120 (phone)

954-343-6958(facsimile)

ROBERT S. BOULTER (SBN 153549)

rsb@boulter-law.com

1101 Fifth Avenue, Suite 310

San Rafael, CA 94901

Tel: (415) 233-7100

Fax: (415)233-7101

*Attorneys for Defendants
Global Client Solutions, LLC and
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~~ **PROPOSED ORDER GRANTING**
) **DEFENDANTS GLOBAL CLIENT**
) **SOLUTIONS, LLC AND ROCKY**
) **MOUNTAIN BANK & TRUST AND**
) **PLAINTIFF HEATHER NEWTON'S**
) **STIPULATED REQUEST FOR**
) **EXTENSION OF DEADLINES**
) **PERTAINING TO THE MOTION FOR**
) **CLASS CERTIFICATION AND**
) **REQUEST FOR POSTPONEMENT OF**
) **CASE MANAGEMENT CONFERENCE**
)

THIS CAUSE having come before the Court on Plaintiff Heather Newton ("Plaintiff")

1 and Defendants Rocky Mountain Bank & Trust (“RMBT”) and Global Client Solutions, LLC
2 (“Global”) (all, “Parties”) Stipulated Request for an Order permitting a brief extension of
3 deadlines pertaining to Plaintiff’s forthcoming Motion for Class Certification and rescheduling
4 the Case Management Conference and hearing on Plaintiff’s Motion for Class Certification, it is
5 now thereupon,

6 PURSUANT TO STIPULATION, IT IS SO ORDERED:

- 7 1. The Parties’ Stipulation is GRANTED.
- 8 2. Plaintiff shall have up through and including **April 24, 2014**, in which to file her
9 motion for class certification;
- 10 3. Defendants Global and RMBT shall have up through and including **May 8, 2014**, in
11 which to file their respective responses to Plaintiff’s motion for class certification;
- 12 4. Plaintiff shall have up to and including **May 15, 2014**, in which to file her reply brief
13 in support of her motion for class certification.
- 14 5. The Case Management Conference scheduled for March 13, 2014 and the hearing on
15 Plaintiff’s motion for class certification scheduled for May 15, 2014, are both hereby
16 rescheduled to **May 29, 2014 at 1:30 p.m.**

17 DONE AND ORDERED in Chambers, at San Francisco, California, on this
18 18th day of February, 2014.

