

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

Tel: (954) 491-1120

Fax: (954) 343-6958

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~~ 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 1) DISCOVERY
) REQUESTS, 2) SUMMARY
) JUDGMENT MOTION, AND 3) CLASS
) CERTIFICATION MOTION AND TO
) CONTINUE CASE MANAGEMENT
) CONFERENCE (modified)

1 THIS CAUSE having come before the Court on Defendants Rocky Mountain Bank &
2 Trust (“RMBT”) and Global Client Solutions, LLC (“Global”) (collectively, “Defendants”) and
3 Plaintiff Heather L. Newton’s (“Plaintiff”) Stipulated Request for an Order: 1) Continuing the
4 deadline for Defendants to comply with Judge Spero’s May 13, 2014 discovery order [Docket
5 #237] (“Discovery Order”); 2) Continuing the hearing date and briefing schedule for Defendants’
6 pending summary judgment motion; and 3) Continuing the hearing date and briefing schedule
7 for Plaintiff’s motion for class certification, and continuing the Case Management Conference, it
8 is now thereupon,

9 PURSUANT TO STIPULATION, IT IS SO ORDERED:

- 10 1. The Parties’ Stipulation is **GRANTED**.
- 11 2. The following deadlines, hearing dates, and Case Management Conference date
12 hereby replace the deadlines and dates in the Court’s May 29, 2014 Order [Docket
13 #241]:
 - 14 a. Defendants shall have up through and including **August 1, 2014** in order to
15 complete the production of documents referenced in this Court’s May 13,
16 2014 Discovery Order [Docket #237];
 - 17 b. Plaintiff’s Opposition to Motion for Summary Judgment shall be due on
18 **September 19, 2014**;
 - 19 c. Defendant’s Reply on Motion for Summary Judgment shall be due on
20 **October 3, 2014**;
 - 21 d. Hearing on Defendants’ Motion for Summary Judgment shall occur on
22 **October 23, 2014**, at **1:30 p.m.**;
 - 23 e. Case Management Conference shall occur on **October 23, 2014**, at **1:30**
24 **p.m.**;
 - 25 f. Plaintiff’s Motion for Class Certification shall be due on **December 8,**
26 **2014**;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- g. Defendants' Opposition to Motion for Class Certification shall be due on **January 9, 2015;**
- h. Plaintiff's Reply on Motion for Class Certification shall be due on **January 29, 2015;**
- i. Hearing on Motion for Class Certification shall occur on **February 12, 2015, at 1:30 p.m.**

DONE AND ORDERED in Chambers, at San Francisco, California, on this
20th day of June, 2014.

