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(Pro Hac Vice Admission Pending)

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*Attorneys for Defendants
Global Client Solutions, LLC and
Rocky Mountain Bank and Trust*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE 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: 5:11-cv-03228-EMC

) CLASS ACTION

) **PLAINTIFF HEATHER NEWTON
DEFENDANTS GLOBAL CLIENT**

) **SOLUTIONS, LLC & ROCKY
MOUNTAIN BANK & TRUST'S**

) **STIPULATION TO EXTEND
DEADLINE TO RESPOND TO**

) **COMPLAINT ; ORDER**

1 Pursuant to both L. R. 6-1(a) & 6-2, Plaintiff Heather Newton (“Plaintiff”)
2 and Defendants Rocky Mountain Bank & Trust (“RMBT”) and Global Client
3 Solutions, LLC (“Global”) (collectively, “Defendants”) (all, “Parties”) file this
4 Stipulation to Extend Defendants’ Deadline to Respond to the Class Action
5 Complaint from November 4, 2011 to November 7, 2011, and state as follows:
6

7 WHEREAS, according to the parties’ Stipulation dated October 10, 2011
8 (“Initial Stipulation”) [D.E. 19], Defendants’ deadline to respond to the Class
9 Action Complaint is November 4, 2011.
10

11 WHEREAS, after conferring with Counsel for Plaintiff, due to competing
12 time demands, the Parties hereby stipulate that Defendants may have through
13 November 7, 2011 to file their response(s) to the Class Action Complaint.
14

15 WHEREAS, furthermore, this Stipulation does not affect the other agreed-
16 upon deadlines from the Initial Stipulation as Plaintiff shall still have through
17 December 2, 2011 to file her opposition to Defendants’ forthcoming motion and
18 Defendants shall have through December 23, 2011 to file their reply.
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20 WHEREAS, this Stipulation will not have an effect on the schedule for this
21 case.
22

23 **WHEREFORE**, Plaintiff Heather Newton and Defendants Rocky Mountain
24 Bank & Trust and Global Client Solutions, LLC stipulate to extend the deadline for
25 Defendants to respond to the Class Action Complaint from November 4, 2011 to
26 November 7, 2011.
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Respectfully submitted,

Dated: November 4, 2011

GREENSPOON MARDER, P.A.

By: /s/ Richard W. Epstein
RICHARD W. EPSTEIN
(FLA. BAR NO: 229091)
(Pro Hac Vice Admission)
REBECCA F. BRATTER
(FLA. BAR NO: 0685100)
(Pro Hac Vice Admission)

Dated: November 4, 2011

LAGARIAS & BOULTER, LLP

By: /s/ Robert S. Boulter
ROBERT S. BOULTER (SBN 153549)

*Attorneys for Defendants GLOBAL
CLIENT SOLUTIONS, LLC & ROCKY
MOUNTAIN BANK & TRUST*

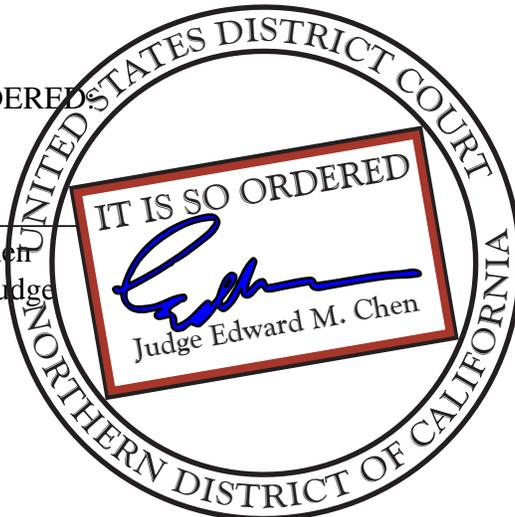
Dated: November 4, 2011

By: /s/ Tavy A. Dumont
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Attorney for Plaintiff and Proposed Class

IT IS SO ORDERED

Edward M. Chen
U.S. District Judge



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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of November, 2011, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Richard W. Epstein