

RICHARD W. EPSTEIN (FLA. BAR NO: 229091)
(Pro Hac Vice Admission Pending)

Richard.Epstein@gmlaw.com

REBECCA F. BRATTER (FLA. BAR NO: 0685100)
(Pro Hac Vice Admission Pending)

Rebecca.Bratter@gmlaw.com

GREENSPOON MARDER, P.A.
Trade Centre South, Suite 700
100 W. Cypress Creek Road, Suite 700
Ft. Lauderdale, FL 33309
954-491-1120
954-343-6958(facsimile)

ROBERT S. BOULTER (SBN 153549)

rsb@lb-attorneys.com

PETER C. LAGARIAS (SBN 77091)

rsb@lb-attorneys.com

LAGARIAS & BOULTER, LLP
1629 Fifth Avenue
San Rafael, California 94901-1828
Telephone: (415) 460-0100
Facsimile: (415) 460-1099

*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 ON GLOBAL
CLIENT SOLUTIONS, LLC,
ROCKY MOUNTAIN BANK AND
TRUST, AND PLAINTIFF'S
STIPULATION RE: DEADLINE TO
RESPOND TO FIRST AMENDED
COMPLAINT [D.E. 11].**

1 THIS CAUSE having come before the Court on Plaintiff Heather Newton
2 (“Plaintiff”) and Defendants Rocky Mountain Bank & Trust and Global Client
3 Solutions, LLC (collectively, “Defendants”) (all, “Parties”) Stipulation pertaining
4 to Defendants’ deadline to respond to Plaintiff’s First Amended Class Action
5 Complaint [D.E. 11], it is now thereupon,

6 PURSUANT TO STIPULATION, IT IS SO ORDERED:

- 7 1. The Parties’ Stipulation is GRANTED.
- 8 2. Defendants’ response to Plaintiff’s First Amended Class Action
9 Complaint shall be filed on or before **May 17, 2012**.

10 DONE AND ORDERED in Chambers, at San Francisco, California, on this
11 20th day of April, 2012.

