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 12 TRANSUNION LLC

13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**  
 15 **SAN FRANCISCO DIVISION**

16 SERGIO L. RAMIREZ, on behalf of himself )  
 17 and all others similarly situated, )

18 Plaintiff, )

19 v. )

20 TRANS UNION, LLC, )

21 Defendant. )  
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Case No. 3:12-cv-00632-JSC

**STIPULATION TO FURTHER EXTEND  
 TIME FOR DEFENDANT TRANSUNION  
 LLC TO RESPOND TO INITIAL  
 COMPLAINT**

LA 51527509

1 WHEREAS, on February 9, 2012, plaintiff Sergio Ramirez (“Plaintiff”) filed the class  
2 action complaint in this action (the “Complaint”) against TransUnion LLC (“TransUnion”), which  
3 Complaint was served on TransUnion on February 16, 2012;

4 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a), TransUnion’s initial time to  
5 respond to the Complaint was March 8, 2012;

6 WHEREAS, pursuant to Local Rule 6-1(a), parties may stipulate in writing, without court  
7 order, to extend the time within which to answer or otherwise respond to the complaint, provided  
8 the change will not alter the date of any event or any deadline already fixed by Court order;

9 WHEREAS, the parties previously agreed to extend the deadline for TransUnion to respond  
10 to the Complaint to and including March 29, 2012;

11 WHEREAS, due to the absence of key TransUnion personnel, TransUnion has requested,  
12 and Plaintiff has agreed, to further extend the deadline for TransUnion to answer or otherwise  
13 respond to the Complaint to and including April 6, 2012; and

14 WHEREAS, the further extension proposed herein will not alter the date of any event or  
15 any deadline already fixed by Court order;

16 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel  
17 of record, that TransUnion’s time to answer or otherwise respond to the Complaint is extended to  
18 and including April 6, 2012.

19 Dated: March 29, 2012

STROOCK & STROOCK & LAVAN LLP  
JULIA B. STRICKLAND  
STEPHEN J. NEWMAN  
BRIAN C. FRONTINO

23 By: \_\_\_\_\_  
Jeffrey B. Bell

25 Attorneys for Defendant  
TRANSUNION LLC



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**DECLARATION OF JEFFREY B. BELL**

I, Jeffrey B. Bell, hereby declare as follows:

1. I am admitted to practice before this Court and am an associate at Stroock & Stroock & Lavan LLP (“Stroock”), counsel for defendant TransUnion LLC (“TransUnion”) in this action. I submit this Declaration in support of the Stipulation to Further Extend Time for TransUnion to Respond to Initial Complaint (the “Stipulation”), in accordance with Section X.B. of General Order 45 of this Court. The facts set forth herein are true of my own personal knowledge. If called as a witness, I could and would competently testify thereto.

2. On March 29, 2012, Andrew J. Ogilvie, counsel for plaintiff Sergio L. Ramirez, sent me an e-mail approving the content of the Stipulation, which I drafted and sent to him for his review and approval on March 28, 2012, and authorizing me to execute it on his behalf.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of March, 2012.

\_\_\_\_\_  
/s/ Jeffrey B. Bell  
Jeffrey B. Bell

Dated: 3/30/2012

