v. Discov	er Financial Services et al				Do¢	
	Case3:12-cv-01118-JSW	Document50	Filed05/23/13	Page1 of 4		
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6	Attorneys for Defendants DISCOVER FINANCIAL SERV	ICES.				
7	DFS SERVICES LLC and DISCO					
8	UNITED STATES DISTRICT COURT					
9	NORTH	ERN DISTRIC	CT OF CALIFO	RNIA		
10	ANDREW STEINFELD and WAI	LTER)	Case No. 3:12-	cv-01118-JSW		
11	BRADLEY, on behalf of themselv others similarly situated,	es and all)	[Assigned to th	e Hon. Jeffrey S. White]		
12	Plaintiff,)				
13	vs. DISCOVER FINANCIAL SERVICES, DFS)	 STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS' RESPONSE TO FIRST AMENDED COMPLAINT 	E		
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15	SERVICES LLC, and DISCOVER	BANK,)				
16	Defendants.)				
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				ND [PROPOSED] ORDER RE DEFENDAI SPONSE TO FIRST AMENDED COMPLA	AINT	
	LA 51651984			Case No. 3:12-cv-01118-J		
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1	Plaintiffs Andrew Steinfeld and Walter Bradley (collectively, "Plaintiffs") and defendants				
2	Discover Financial Services, DFS Financial Services, LLC, and Discover Bank (collectively,				
3	"Defendants"), through their undersigned counsel, hereby stipulate as follows:				
4	WHEREAS, on May 17, 2013, Plaintiffs filed the First Amended Complaint, Docket No. 47				
5	(the "FAC"); and				
6	WHEREAS, on May 17, 2013, Plaintiff filed the Unopposed Motion for Preliminary				
7	Approval of Settlement Agreement, Docket No. 48-1 (the "Preliminary Approval Motion"), which				
8	requests the Court enter an order preliminarily approving the Parties' Settlement Agreement, dated				
9	May 17, 2013 (the "Settlement Agreement"); and				
10	WHEREAS, pursuant to Section III.A. of the Settlement Agreement, the Parties agreed that				
11	Discover shall not be required to respond to the FAC.				
12	NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiffs,				
13	by their undersigned counsel, and Defendants, by their undersigned counsel, that Discover shall not				
14	be required to respond to the FAC pending the Court's order on the Preliminary Approval Motion				
15	and any subsequent motion for final approval of the Settlement Agreement (the "Final Approval				
16	Motion"). If the Court enters an order denying the Preliminary Approval Motion or Final Approval				
17	Motion, Discover shall file and serve an answer or a motion under Rule 12 of the Federal Rules of				
18	Civil Procedure within forty-five (45) days after entry of such order.				
19	IT IS SO STIPULATED.				
20	Dated: May 23, 2013	STROOCK & STROOCK & LAVAN LLP			
21		By:	/s/ Lisa M. Simonetti		
22		Julia B. Stri	Lisa M. Simonetti		
23	jstrickland@stroock.com Lisa M. Simonetti				
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27			310-556-5800		
28		-1-	STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'		
			RESPONSE TO FIRST AMENDED COMPLAINT Case No. 3:12-cv-01118-JSW		
	LA 51651984				

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1	Attorneys for Defendants Discover Financial Services, DFS Services LLC And Discover Bank
2 3	Dated: May 23, 2013 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
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23	Matthew R. Wilson (admitted <i>pro hac vice</i>) 1320 Dublin Road, Ste. 100 Columbus, Ohio 43215
24 25	Telephone: (614) 224-6000 Facsimile: (614) 224-6066
26	Attorneys for Plaintiffs Steinfeld and Bradley and the
27	Proposed Class
28	-2- STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS'
	RESPONSE TO FIRST AMENDED COMPLAINT Case No. 3:12-cv-01118-JSW LA 51651984

CERTIFICATE OF SERVICE

I hereby certify that, on May 23, 2013, copies of the foregoing STIPULATION AND

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3	[PROPOSED] ORDER RE DEFENDANTS' RESPONSE TO FIRST AMENDED			
4	COMPLAINT were filed electronically and served by U.S. Mail on anyone unable to accept			
5	electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's			
6	electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on			
7	the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.			
8				
9	/s/Lisa M. Simonetti			
10	Lisa M. Simonetti			
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28	STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS' RESPONSE TO FIRST AMENDED COMPLAINT			
	Case No. 3:12-cv-01118-JSW LA 51651984			

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	1	1 [PROPOSED] ORDER					
	2	FOR GOOD CAUSE APPEARING AND PURSUANT TO THE STIPULATION, IT					
	3	IS SO ORDERED.					
	4						
	5	Dated: May 28, 2013					
	6	Hon Jeffer S. White United States District Court Judge					
	7						
OCK & STROOCK & LAVAN LLP 2029 Century Park East Los Angeles, California 90067-3086	8						
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	28	-3- STIPULATION AND [PROPOSED] ORDER RE DEFENDANTS' RESPONSE TO FIRST AMENDED COMPLAINT Case No. 3:12-cv-01118-JSW LA 51651984					