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17 *Attorneys for Plaintiff and*
 18 *the Proposed Class*

19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 21 SAN FRANCISCO / OAKLAND DIVISION

22 MADELINE MARTIN, on behalf of
 23 herself and all others similarly situated,

24 Plaintiff,

25 v.

26 WELLS FARGO BANK, N.A.,

27 Defendants.
 28

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Case No. 3:12-cv-06030-SI

**STIPULATION AND ~~[PROPOSED]~~
 ORDER TO EXTEND TIME TO RESPOND
 TO DEFENDANT'S MOTION TO
 COMPEL ARBITRATION**

1 Plaintiff Madeline Martin (“Plaintiff”) and defendant Wells Fargo Bank, N.A. (“Wells
2 Fargo”), through their undersigned counsel, hereby stipulate as follows:

3 WHEREAS, on March 7, 2013, Wells Fargo filed a motion to stay and dismiss this action
4 and compel Plaintiff to arbitrate her claims as an individual (Dkt. No. 30) (“Motion to Compel
5 Arbitration”);

6 WHEREAS, on March 11, 2013, pursuant to Stipulation and Order (Dkt. No. 26), Plaintiff
7 served 13 arbitration-related requests for production of documents (“RFPs”) and seven
8 interrogatories (“ROGs”), and also proposed to depose the two Wells Fargo employees who
9 submitted declarations in support of the Motion to Compel Arbitration;

10 WHEREAS, the parties met and conferred regarding the arbitration related discovery and,
11 on April 1, 2013, filed a discovery dispute letter with the Court (Dkt. No. 36) (“Motion to Compel
12 Production”);

13 WHEREAS, on April 2, 2013, the parties attended a case management conference and the
14 Court ordered that the hearing on the Motion to Compel Arbitration be continued to June 28,
15 2013, with Plaintiff’s Opposition due on June 7, 2013 and Wells Fargo’s Reply due on June 14,
16 2013 (Dkt. No. 37);

17 WHEREAS, on May 17, 2013, the Court ordered Wells Fargo to respond to certain
18 arbitration-related discovery, directed the parties to meet and confer to determine a deadline for
19 Wells Fargo’s responses and dates for the depositions, and also provided that the parties could
20 submit, if necessary, a stipulation regarding a revised briefing schedule on the Motion to Compel
21 Arbitration (Dkt. No. 38) (“Order”);

22 WHEREAS, Wells Fargo has not yet provided responses to the arbitration-related
23 discovery, but has agreed to do so as soon as practicable and by no later than the dates set forth
24 below;

25 WHEREAS, on June 3, 2013, Wells Fargo represented that the earliest dates the Wells
26 Fargo declarants are available for their depositions are July 9, 2013 and July 11, 2013.

27 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiff,
28 by their undersigned counsel, and Wells Fargo, by their undersigned counsel, that:

1 (1) Wells Fargo shall produce all documents responsive to the RFPs as set forth in the
2 Order by June 18;

3 (2) Wells Fargo shall produce all information responsive to the ROGs as set forth in
4 the Order by June 28;

5 (3) The deadline for Plaintiff to file an opposition to Wells Fargo's Motion to Compel
6 Arbitration is continued to July 19.

7 (4) The deadline for Wells Fargo to file a reply in support of its Motion to Compel
8 Arbitration is continued to July 31;

9 (5) The hearing on Wells Fargo's Motion to Compel Arbitration is continued to Friday
10 August 16 at 9:00 a.m., or as soon thereafter as the Court is available.

11
12 Dated: June 6, 2013

By: Jonathan D. Selbin
Jonathan D. Selbin

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Attorneys for Plaintiff Martin and the Proposed Class

Dated: June 6, 2013

By: Kalama M. Lui-Kwan
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Attorneys for Defendant Wells Fargo Bank

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ATTESTATION

I, Jonathan D. Selbin, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Kalama M. Lui-Kwan has concurred in this filing.

Jonathan D. Selbin
Jonathan D. Selbin

ORDER

Pursuant to Stipulation, it is so ORDERED.

Dated: 6/11, 2013

Susan Illston
SUSAN ILLSTON
United States District Judge