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 SLM CORPORATION and SALLIE MAE, INC.  
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9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA**

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 12 ANDREW BRADSHAW, TANIF ) Case No. CV-12-6376-JSW  
 STEPHENSON, ADAM CORRIVEAU, and )  
 13 JESELL GONZALEZ, on behalf of themselves ) [Assigned to the Hon. Jeffrey S. White]  
 and similarly situated individuals, )

14 Plaintiff,

15 v.

16 SLM CORPORATION, a Delaware  
 17 corporation; and SALLIE MAE, INC., a  
 Delaware corporation,

18 Defendants.

) **STIPULATION AND ~~PROPOSED~~**  
 ) **ORDER EXTENDING TIME FOR**  
 ) **DEFENDANTS TO MOVE TO DISMISS**  
 ) **PLAINTIFFS' COMPLAINT, SETTING**  
 ) **BRIEFING SCHEDULE ON MOTION TO**  
 ) **DISMISS, STAYING DISCOVERY AND**  
 ) **CONTINUING CASE MANAGEMENT**  
 ) **CONFERENCE**

) Action Filed: December 17, 2012

) [Local Rule 6-1(b)]

) [Declaration of Lisa M. Simonetti filed  
 21 concurrently]

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 STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFENDANTS TO MOVE TO DISMISS  
 PLAINTIFFS' COMPLAINT, SETTING BRIEFING SCHEDULE ON MOTION TO DISMISS, STAYING  
 DISCOVERY AND CONTINUING CASE MANAGEMENT CONFERENCE

1 WHEREAS, plaintiffs Andrew Bradshaw, Tanif Stephenson, Adam Corriveau and Jesell  
2 Gonzalez (“Plaintiffs”) filed their Class Action Complaint for Equitable, Declaratory and  
3 Injunctive Relief and Damages For (1) Aiding and Abetting Fraud, (2) Mistake of Fact, (3) Unjust  
4 Enrichment, (4) Violations of the California Unfair Competition Law, and (5) Violations of the  
5 Oklahoma Consumer Protection Act (“Complaint”) on December 17, 2012;

6 WHEREAS, on or about January 16, 2013, the Complaint was served on defendants SLM  
7 Corporation and Sallie Mae, Inc. (“Defendants”);

8 WHEREAS, Plaintiffs filed their First Amended Class Action Complaint (“FAC”) on  
9 February 4, 2013;

10 WHEREAS, on or about February 4, 2013, counsel for Defendants agreed to accept service  
11 of the FAC on behalf of Defendants;

12 WHEREAS, Defendants’ response to the FAC currently is due on March 22, 2013;

13 WHEREAS, Plaintiffs have agreed to grant Defendants an extension of time to file a  
14 response to the FAC up to and including March 29, 2013;

15 WHEREAS, Defendants have notified Plaintiffs of their intent to file a Motion to Dismiss  
16 the FAC;

17 WHEREAS, the parties have agreed on a proposed briefing schedule for Defendants’  
18 Motion to Dismiss;

19 WHEREAS, a Case Management Conference is currently set for April 19, 2013;

20 WHEREAS, to conserve judicial resources, the parties have further agreed to stay discovery  
21 and other proceedings until after the hearing on the Motion to Dismiss;

22 WHEREAS, pursuant to Civil Local Rules 6-1(b) and 6-2, the parties may request an order  
23 changing a deadline that would extend deadlines set forth in the Local Rules or Federal Rules;

24 WHEREAS, this Stipulation is made in good faith and not for purposes of delay; and

25 WHEREAS, good cause exists for the foregoing modifications to the case schedule because  
26 it would promote judicial efficiency to stay discovery and to continue the Case Management  
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1 Conference and the parties' submission of their Joint Case Management Statement until after the  
2 hearing on the motion to dismiss.

3 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel  
4 of record, as follows:

5 (a) Defendants' Motion to Dismiss shall be filed and served by March 29, 2013;

6 (b) Plaintiffs' Opposition to the Motion to Dismiss shall be filed and served by May 3,  
7 2013, and Defendants' Reply shall be filed and served by May 17, 2013;

8 (c) The date of the hearing on the Motion to Dismiss shall be May 24, 2013, at 9:00  
9 a.m. in Courtroom 11;

10 (d) Pending a ruling on the Motion to Dismiss, all discovery shall be stayed;

11 (e) The Case Management Conference set for April 19, 2013 at 1:30 p.m. shall be  
12 continued to July 26, 2013, 2013 at 1:30 p.m.;

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