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8 Attorneys for Defendants
 SLM CORPORATION and SALLIE MAE, INC.
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10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

13 ANDREW BRADSHAW, TANIF) Case No. CV-12-6376-JSW
 STEPHENSON, ADAM CORRIVEAU, and)
 14 JESELL GONZALEZ, on behalf of themselves) [Assigned to the Hon. Jeffrey S. White]
 and similarly situated individuals,)
 15) **STIPULATION AND ~~PROPOSED~~**
 Plaintiff,) **ORDER EXTENDING TIME FOR**
 16) **DEFENDANTS TO RESPOND TO**
 v.) **PLAINTIFFS' SECOND AMENDED**
 17) **COMPLAINT**
 SLM CORPORATION, a Delaware)
 18 corporation; and SALLIE MAE, INC., a) Action Filed: December 17, 2012
 Delaware corporation,)
 19) [Local Rule 6-1(b)]
 Defendants.)
 20) [Declaration of Joann M. Nguyen filed
 21) concurrently]
 22)
 23)
 24)
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 26)
 27)
 28)

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1 WHEREAS, on December 17, 2012, plaintiffs Andrew Bradshaw, Tanif Stephenson, Adam
2 Corriveau and Jesell Gonzalez (“Plaintiffs”) filed their Class Action Complaint for Equitable,
3 Declaratory and Injunctive Relief and Damages For (1) Aiding and Abetting Fraud, (2) Mistake of
4 Fact, (3) Unjust Enrichment, (4) Violations of the California Unfair Competition Law, and (5)
5 Violations of the Oklahoma Consumer Protection Act (“Complaint”) on December 17, 2012
6 (Docket No. 1);

7 WHEREAS, Plaintiffs filed their First Amended Class Action Complaint (“FAC”) on
8 February 4, 2013 (Docket No. 11);

9 WHEREAS, the Court granted a motion to dismiss the FAC with leave to amend (Docket
10 No. 31);

11 WHEREAS, Plaintiffs prepared a Second Amended Class Action Complaint (“SAC”) that
12 included two additional claims and re-plead the claims that were the subject of the FAC, and on
13 November 15, 2103, filed a motion for leave to amend to add the additional claims and attached the
14 draft SAC;

15 WHEREAS, Defendants opposed the motion for leave to amend the SAC on grounds that
16 the additional claims, as pled, were futile;

17 WHERAS, on February 2, 2014, the Court granted the motion for leave to amend (Docket
18 No. 41);

19 WHEREAS, pursuant to the Court’s Order issued on February 2, 2014, Plaintiffs filed their
20 SAC on February 11, 2014. (Docket No. 42);

21 WHEREAS, Defendants’ response to the SAC currently is due on February 28, 2014;

22 WHEREAS, due to Defendants’ counsel’s vacation schedule and Defendants’ need to
23 evaluate the allegations, Plaintiffs have agreed to grant Defendants an extension of time to file their
24 response to the SAC up to and including March 31, 2014;

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

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

28

~~PROPOSED~~ ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: February 26, 2014


The Honorable Jeffrey S. White

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