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*Attorneys for Defendants Trans Union LLC
 and Trans Union Rental Screening
 Solutions, Inc.*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

19 AMIT PATEL, on behalf of himself and all)
 20 others similarly situated,)
 21 Plaintiff(s),)

21 v.)

22 TRANS UNION, LLC, in its own name and)
 23 t/a TRANS UNION RENTAL)
 24 SCREENING SOLUTIONS, INC. and)
 25 TRANSUNION BACKGROUND DATA)
 26 SOLUTIONS, and TRANS UNION)
 27 RENTAL SCREENING SOLUTIONS,)
 28 INC. in its own name and t/a)
 TRANSUNION BACKGROUND DATA)
 SOLUTIONS,)
 Defendants.)

Case No. 14-0522-LB

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND NON-EXPERT
 DISCOVERY AND EXPERT
 DISCLOSURE DEADLINES**

1
2 Plaintiff Amit Patel and Defendants Trans Union LLC and Trans Union Rental Screening
3 Solutions, Inc. (collectively, the “Parties”), through their undersigned counsel, hereby jointly request
4 (i) a 28-day extension of the non-expert discovery deadline (for already-served written and oral
5 discovery requests only) until February 17, 2017, and (ii) a 21-day extension of the initial expert
6 disclosure deadline until March 3, 2017. The requested extensions will not affect the other existing
7 deadlines to complete expert discovery and brief dispositive motions, or the Court’s pre-trial and
8 trial schedule. In support of their stipulation, the Parties state as follows:

9 1. On June 27, 2016, the Court entered a Revised Scheduling Order (ECF 123).

10 2. Since that time, the Parties briefed and the Court ruled on Defendants’ Motion to
11 Decertify Classes, Plaintiff mailed notice to the certified class and sub-class, and the Parties have
12 diligently engaged in Phase II (i.e., merits) discovery in this matter.

13 3. The Parties need additional time to respond to already-served written discovery
14 requests and to schedule already-noticed depositions (as well as to continue any related meet-and-
15 confer efforts and file any necessary motions to compel if those efforts are unsuccessful).

16 4. The Parties have conferred and request a 28-day extension of the non-expert
17 discovery deadline (for already-served written and oral discovery requests only) to February 17,
18 2017 and a 21-day extension of the initial expert disclosure deadline to March 3, 2017.

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| <u>Case Event</u> | <u>Current Deadline</u> | <u>Proposed Deadline</u> |
|--|--------------------------------|---------------------------------|
| Non-expert discovery completion date | 1/20/2017 | 2/17/2017 |
| Expert disclosures required by Federal Rules of Civil Procedure | 2/10/2017 | 3/3/2017 |

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24 5. The requested extensions will not affect the other existing deadlines to complete
25 expert discovery and brief dispositive motions, or the Court’s pre-trial and trial schedule.
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Respectfully submitted,

FRANCIS & MAILMAN, P.C.

REED SMITH LLC

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Attorney for Plaintiff

*Attorney for Defendants Trans Union LLC and
Trans Union Rental Screening Solutions, Inc.*

Dated: January 17, 2017

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 18, 2017



Hon. Laurel Beeler
United States Magistrate Judge