

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Seyfarth Shaw LLP
 Christian J. Rowley (SBN 187293)
 560 Mission Street, 31st Floor
 San Francisco, California 94105
 Telephone: (415) 397-2823
 Facsimile: (415) 397-8549
 crowley@seyfarth.com

Richard L. Alfred (SBN 015000) (pro hac vice)
 Two Seaport Lane, Suite 300
 Boston, Massachusetts 02210
 Telephone: (617) 496-4802
 Facsimile: (617) 946-4801
 ralfred@seyfarth.com

Timothy M. Watson (SBN 20963575) (pro hac vice)
 700 Milam Street, Suite 1400
 Houston, Texas 77002-2812
 Telephone: (713) 225-2300
 Facsimile: (713) 225-2340
 twatson@seyfarth.com

Padilla & Rodriguez, LLP
 John M. Padilla (SBN 279815)
 jpadilla@pandrlaw.com
 601 S. Figueroa St., Suite 4050
 Los Angeles, California 90017
 Telephone: (213) 244-1401
 Facsimile: (213) 244-1402

Wills Law Firm, PLLC
 Rhonda H. Wills (pro hac vice)
 rwills@rwillslawfirm.com
 Genevieve Estrada (pro hac vice)
 gestrada@rwillslawfirm.com
 1776 Yorktown, Suite 570
 Houston, Texas 77056
 Telephone: (713) 528-4455
 Facsimile: (713) 528-2047

Attorneys for Defendants

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

KELLY CARROLL, Individually and On Behalf of
 All Others Similarly Situated,

 Plaintiffs,

 v.

 WELLS FARGO & COMPANY, and WELLS
 FARGO BANK, N.A.,

 Defendants.

Case No. 3:15-CV-02321-EMC

**STIPULATION CONCERNING
 DEADLINE FOR MEDIATION,
 CLASS CERTIFICATION MOTION
 AND HEARING AND FURTHER
 CASE MANAGEMENT
 CONFERENCE**

Pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, Plaintiff Kelly Carroll (“Plaintiff”) and Defendants Wells Fargo & Co. and Wells Fargo Bank, N.A. (“Defendants” or “Wells Fargo”) hereby stipulate as follows:

1 WHEREAS, during the January 14, 2016 hearing in this matter, the Honorable Court
2 ordered the parties in the above-referenced matter to mediation within 90 days of January 14,
3 2016, or by April 13, 2016.

4 WHEREAS, in the Court's minute entry, the Court set certain other deadlines and
5 hearings that the parties understood were determined in part based on the mediation deadline,
6 since the parties and the Court discussed the desire to limit discovery costs to the extent the case
7 could be settled.

8
9 WHEREAS, the parties have worked diligently to agree to a mediator and set a mediation
10 date. The parties have agreed, subject to the Court approving the extension of the mediation
11 deadline, to mediate with David Rottman in San Francisco, California, on June 7, 2016. June 7,
12 2016 is the earliest date all the parties and Mr. Rottman are available for mediation.

13
14 WHEREAS, the parties have agreed to the stipulated dates herein, subject to approval of
15 the Court.

16 THEREFORE, THE PARTIES AGREE AND STIPULATE TO THE FOLLOWING
17 subject to approval by the Court:

- 18 1. The parties' are Ordered to mediate this matter by June 30, 2016.
- 19 2. The deadline for Plaintiff to file her Motion for Class Certification is extended to
20 August 31, 2016.
- 21 3. Defendants' Opposition to Plaintiff's Motion for Class Certification is due September
22 30, 2016.
- 23 4. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class
24 Certification is due October 19, 2016.
- 25 5. The Further Case Management Conference is rescheduled from October 6, 2016 to
26 November 17, 2016 at 1:30 PM in Courtroom 5, 17th Floor, San Francisco.
- 27
28

- 1 6. The Motion for Class Certification Hearing is rescheduled from October 6, 2016 to
2 November 17, 2016 at 1:30 PM in Courtroom 5, 17th Floor, San Francisco.
3
4 7. The deadline for filing of the Further Case Management Statement is extended from
5 September 29, 2016 to November 10, 2016.

6 Pursuant to Local Rule 6-2, there have been no other time modifications on the
7 motion that is the subject of this Stipulation, and it is not anticipated that this extension will
8 affect the schedule for the case. Also pursuant to Local Rule 6-2, the declaration of Rhonda H.
9 Wills is attached as Exhibit A to the Stipulation.

10 **IT IS SO STIPULATED.**

11 Dated: March 4, 2016

12
13 By: /s/ Rhonda H. Wills
14 Rhonda H. Wills (pro hac vice)
15 Email: rwills@rwillslawfirm.com
16 WILLS LAW FIRM, PLLC
17 1776 Yorktown, Suite 570
18 Houston, Texas 77056
19 Telephone: (713) 528-4455
20 Facsimile: (713) 528-2047

21
22 John M. Padilla (Cal. Bar No. 279815)
23 Email: jpadilla@pandrlaw.com
24 PADILLA & RODRIGUEZ, L.L.P.
25 601 South Figueroa Street, Suite 4050
26 Los Angeles, CA 90017
27 Telephone: (213) 244-1401
28 Facsimile: (213) 244-1402

23 Dated: March 4, 2016

24
25 By: /s/ Timothy M. Watson
26 Timothy Watson (SBN 20963575) (pro hac vice)
27 Email: twatson@seyfarth.com
28 SEYFARTH SHAW LLP
700 Milam Street, Suite 1400
Houston, Texas 77002-2812
Telephone: (713) 225-2300
Facsimile: (713) 225-2340

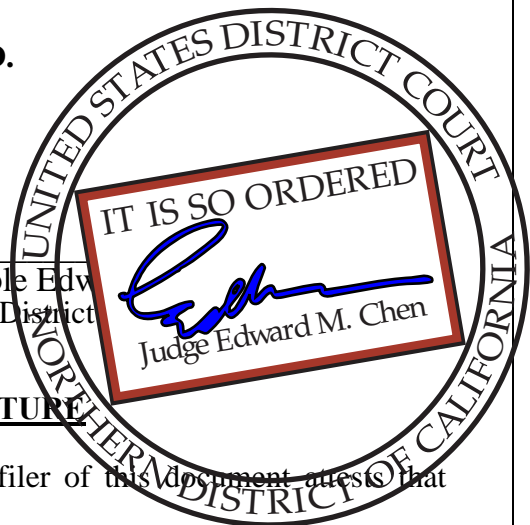
Christian J. Rowley (SBN 187293)
Email: crowley@seyfarth.com
SEYFARTH SHAW LLP
560 Mission Street, 31st Floor
San Francisco, California 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

Richard L. Alfred (SBN 015000) (pro hac vice)
Email: ralfred@seyfarth.com
SEYFARTH SHAW LLP
Two Seaport Lane, Suite 300
Boston, Massachusetts 02210
Telephone: (617) 496-4802
Facsimile: (617) 946-4801

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 3/4, 2016

The Honorable Edward Chen
United States District Court



ATTESTATION OF SIGNATURE

Pursuant to Civil Local Rules 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory above.

Dated: March 4, 2016

By: /s/ Rhonda H. Wills
Rhonda H. Wills (pro hac vice)
Email: rwills@rwillslawfirm.com
WILLS LAW FIRM, PLLC
1776 Yorktown, Suite 570
Houston, Texas 77056
Telephone: (713) 528-4455
Facsimile: (713) 528-2047

1 John M. Padilla (SBN 279815)
2 jpadilla@pandrlaw.com
3 **PADILLA & RODRIGUEZ, LLP**
4 601 S. Figueroa St., Suite 4050
5 Los Angeles, California 90017
6 Telephone: (213) 244-1401
7 Facsimile: (213) 244-1402

Rhonda H. Wills (*pro hac vice*)
rwills@rwillslawfirm.com
Genevieve Estrada (*pro hac vice*)
gestrada@rwillslawfirm.com
WILLS LAW FIRM, PLLC
1776 Yorktown, Suite 570
Houston, Texas 77056
Telephone: (713) 528-4455
Facsimile: (713) 528-2047

8
9 ATTORNEYS FOR PLAINTIFF
10 AND THE PUTATIVE CLASSES

11
12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 KELLY CARROLL, Individually and On Behalf of
17 All Others Similarly Situated,

18 Plaintiffs,

19 v.

20 WELLS FARGO & COMPANY, and WELLS
21 FARGO BANK, N.A.,

22 Defendants.

23 Case No. 3:15-CV-02321-EMC

24 **DECLARATION OF RHONDA H.**
25 **WILLS IN SUPPORT OF**
26 **STIPULATION CONCERNING**
27 **DEADLINE FOR MEDIATION,**
28 **CLASS CERTIFICATION MOTION**
AND HEARING AND FURTHER
CASE MANAGEMENT
CONFERENCE

1 I, Rhonda H. Wills, declare as follows:

2 1. I am managing partner of Wills Law Firm, PLLC, one of the firms serving as
3 Plaintiff's counsel herein. I make these statements based on personal knowledge and would so
4 testify if called as a witness.

5 2. This Declaration is submitted in support of the Parties' Stipulation Concerning
6 Deadline for Mediation, Class Certification Motion and Hearing and Further Case Management
7 Conference.

8 3. During the January 14, 2016 hearing in this matter, the Honorable Court ordered
9 the parties in the above-referenced matter to mediation within 90 days of January 14, 2016, or by
10 April 13, 2016. In the Court's minute entry, the Court set certain other deadlines and hearings
11 that Plaintiff's counsel understood were determined in part based on the mediation deadline,
12 since the parties and the Court discussed the desire to limit discovery costs to the extent the case
13 could be settled.

14 4. The parties have worked diligently to agree to a mediator and set a mediation
15 date. The parties have agreed, subject to the Court approving the extension of the mediation
16 deadline, to mediate with David Rottman in San Francisco, California, on June 7, 2016. June 7,
17 2016 is the earliest date all the parties and Mr. Rottman are available for mediation.

18 5. Therefore, the parties have agreed and stipulated to the following subject to
19 approval by the Court:

- 20 a. Mediation to occur June 30, 2016.
- 21 b. Plaintiffs to file their Motion for Class Certification by August 31, 2016.
- 22 c. Defendants' Opposition to Plaintiff's Motion for Class Certification is due
23 September 30, 2016.
- 24 d. Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Class
25 Certification is due October 19, 2016.
- 26 e. Further case Management Conference on November 17, 2016 at 1:30 PM
27 in Courtroom 5, 17th Floor, San Francisco.
- 28

1 f. Motion for Class Certification Hearing on November 17, 2016 at 1:30 PM
2 in Courtroom 5, 17th Floor, San Francisco.

3 g. Deadline for filing of the Further Case Management Statement is
4 November 10, 2016.

5 6. Pursuant to Local Rule 6-2, there have been no other time modifications on the
6 motion that is the subject of the Parties' Stipulation, and it is not anticipated that this extension
7 will affect the schedule for the case.

8 * * *

9 I declare under penalty of perjury under the laws of the United States and the State of
10 California that the foregoing is true and correct. Executed this 4 day of March, 2016,
11 at Houston, Texas.

12 
13 Rhonda H. Wills