

1 Raymond A. Cardozo (SBN 173263)  
 email: rcardozo@reedsmith.com  
 2 Ashley L. Shively (SBN 264912)  
 email: ashively@reedsmith.com  
 3 REED SMITH LLP  
 101 Second Street, Suite 1800  
 4 San Francisco, CA 94105-3659  
 Telephone: +1 415 543 8700  
 5 Facsimile: +1 415 391 8269

6 Peter J. Kennedy (SBN 166606)  
 Email: pkennedy@reedsmith.com  
 7 REED SMITH LLP  
 355 South Grand Avenue, Suite 2900  
 8 Los Angeles, CA 90071-1514  
 Telephone: +1 213 457 8000  
 9 Facsimile: +1 213 457 8080

10 Attorneys for Defendant  
 Wells Fargo Bank, N.A.

REED SMITH LLP  
 A limited liability partnership formed in the State of Delaware

11  
 12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

14 LATASHA McLAUGHLIN, on behalf of  
 herself and all others similarly situated,  
 15  
 16 Plaintiff,  
 17  
 vs.  
 18  
 19 WELLS FARGO BANK, N.A., d/b/a WELLS  
 FARGO HOME MORTGAGE,  
 20  
 21 Defendant.

Case No.: 3:15-cv-02904-WHA

**CORRECTED STIPULATED REQUEST  
 FOR ORDER TO RESET CERTAIN  
 DEADLINES; AND [~~PROPOSED~~] ORDER**

Honorable William H. Alsup

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 28 Case No. 3:15-cv-02904-WHA

**STIPULATION**

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2 Plaintiff Latasha McLaughlin and Defendant Wells Fargo Bank, N.A., by and through their  
3 respective counsel, stipulate as follows:

4 WHEREAS, under the Court’s Notice [Dkt. 17], the parties were precluded from discussing a  
5 class settlement until the Court ruled on class certification;

6 WHEREAS, on June 22, 2016, the Court issued an order certifying two classes under TILA  
7 [Dkt. 123] and set deadlines of July 12, 2016 for a joint notice plan to be submitted to the court, and  
8 to plan to distribute class notice by July 28, 2016;

9 WHEREAS, the litigation to date has largely joined the merits and class certification issues,  
10 and framed the parties’ positions. Therefore following the Court’s ruling on class certification,  
11 which opened the door to engage in settlement discussions, the parties promptly began negotiations  
12 and held a telephone settlement conference with Magistrate Judge Ryu on June 30, 2016;

13 WHEREAS, the parties will attend an in-person mediation with Magistrate Judge Ryu on  
14 August 5, 2016 at 10:00 am;

15 WHEREAS, the Court’s Scheduling Order [Dkt. 37], issued in October 2015, originally set a  
16 class certification hearing for February 2016 and discovery deadlines in August 2016. The Order  
17 thus contemplated approximately 6 months from the issuance of an order on class certification until  
18 the discovery cutoff, for the parties to discuss a class resolution. Because class certification was not  
19 ruled on until June 22, 2016, however, the time available for the parties to meaningfully discuss  
20 resolution is now substantially shorter.

21 WHEREAS, the parties are presently engaging in good faith settlement discussions and  
22 mutually seek to focus their respective resources on timely reaching a class resolution;

23 THEREFORE, Plaintiff and Wells Fargo hereby agree as follows:

24 1. Class Notice:

- 25 a. To extend the deadline to submit a joint proposal for class notification from  
26 Tuesday, July 12, 2016 to Tuesday, August 23, 2016;

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- b. To extend the target date to distribute notice from Thursday, July 28, 2016 to Thursday, September 8, 2016.
- 2. Wells Fargo’s Motion for Summary Judgment:
  - a. Wells Fargo’s Motion for Summary Judgment [Dkt. 65] shall be set for hearing on November 3, 2016;
  - b. Plaintiff’s Opposition shall be filed by September 29, 2016;
  - c. Wells Fargo’s Reply shall be filed by October 13, 2016.
- 3. Other Pretrial Deadlines:
  - a. The non-expert discovery cut-off shall be continued from Wednesday, August 31, 2016 to Wednesday, September 28, 2016;
  - b. The expert deadlines set in paragraph 5 of the Court’s Scheduling Order [Dkt. 37] shall be continued by 28 days, such that the last date for designation of expert testimony and disclosure of expert reports on issues where a party has the burden of proof shall be continued from August 31, 2016 to September 28, 2016. Opposition and reply report deadlines, expert discovery cutoff, and other deadlines in Paragraphs 5 and 6 (damages studies) of the Scheduling Order are triggered off the September 28, 2016 opening report date as indicated in the Court’s Scheduling Order;
  - c. The remaining dates in the Court’s Scheduling Order, including the September 29 deadline to file dispositive motions; November 3, 2016 deadline to hear dispositive motions, November 30, 2016 pretrial conference, and December 5, 2016 trial date, remain as set by the Court.

**IT IS SO STIPULATED.**

DATED: July 1, 2016

**REED SMITH LLP**

By: /s Ashley Shively  
Ashley L. Shively  
Attorneys for Defendant  
Wells Fargo Bank, N.A.

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DATED: July 1, 2016

**WOLF POPPER LLP**

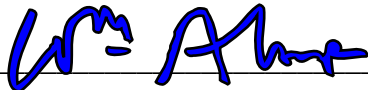
By: /s/ Patricia Avery  
Patricia I. Avery (*pro hac vice*)  
Matthew Insley-Pruitt (*pro hac vice*)  
*Counsel for Plaintiff and the Class*

**BERMAN DEVALERIO**

Joseph J. Tabacco, Jr.  
Kristin J. Moody  
*Local Counsel for Plaintiff and the Class*

**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Dated July 1, 2016

  
WILLIAM H. ALSUP  
UNITED STATES DISTRICT JUDGE