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A limited liability partnership formed in the State of Delaware

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12 Wells Fargo Bank, N.A.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

15 LATASHA McLAUGHLIN, on behalf
16 of herself and all others similarly
17 situated,

18 Plaintiff,

19 vs.

20 WELLS FARGO BANK, N.A., d/b/a
21 WELLS FARGO HOME MORTGAGE,

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

**JOINT STIPULATION TO
CONTINUE DEADLINE FOR
NOTICE TO CLASS FOR 14 DAYS
TO ALLOW FOR COMPLETION OF
SETTLEMENT AGREEMENT;
DECLARATION OF PETER
KENNEDY IN SUPPORT
THEREOF; AND [PROPOSED]
ORDER**

L.R. 6-2

Honorable William H. Alsup

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

1
2 Plaintiff Latasha McLaughlin and Defendant Wells Fargo Bank, N.A., by and
3 through their respective counsel, stipulate as follows:

4 WHEREAS, on August 29, 2016, this Court issued an order [Dkt. # 140]
5 approving the parties' joint plan [Dkt. #139] for providing notice to the class of the
6 Court's certification order [Dkt # 132]. This plan called for the notice to be sent
7 within 16 days of the Court's order, which creates a mailing deadline of September
8 14, 2016. The plan also called for the class list to be provided to the administrator by
9 September 1, 2016. *Id.*

10 WHEREAS, thanks to the efforts of Magistrate Judge Donna M. Ryu, the
11 parties have made significant progress toward the resolution of the matter, and a draft
12 comprehensive class settlement agreement has been circulated. Kennedy Declaration,
13 at Para. 2.

14 WHEREAS, to avoid the cost of the Class Administrator and the needless
15 printing and mailing of the notice, estimated to be nearly \$20,000, the parties agree
16 and respectfully request that the deadline for mailing the notice be continued two
17 weeks to September 28, 2016. The parties anticipate that this two week continuance
18 will be sufficient for them to complete the settlement agreement, advise the Court of
19 the settlement, and request that the current trial and notice dates be vacated to allow
20 for a motion for preliminary approval to be filed and heard. For the same reasons, the
21 parties' request the deadline to provide the class list to the Class Administrator also be
22 moved to September 21, 2016.

23 WHEREAS, the parties' request will not otherwise alter the schedule in the
24 case.

25 THEREFORE, Plaintiff and Wells Fargo hereby agree to extend:

- 26 1. The deadline for Wells Fargo to provide the class list to the Class
27 Administrator from September 1, 2016 to September 21, 2016.

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2. The deadline for mailing the class notice from September 14, 2016 to September 28, 2016.

DATED: September 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

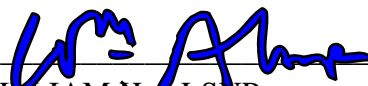
DATED: September 1, 2016

REED SMITH LLP

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

PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO ORDERED.

Dated September 1, 2016


WILLIAM H. ALSUP
UNITED STATES DISTRICT JUDGE