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8 Attorney for Plaintiffs
 9 CHRIS ROMO AND DULIA ROMO

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

12 CHRIS ROMO AND MARIA DULIA
 13 ROMO,
 14 Plaintiffs,

15 v.

16 WELLS FARGO BANK, N.A. WELLS
 17 FARGO HOME MORTGAGE and Does 1
 18 through 20, inclusive,
 19 Defendants.

CASE NO.: 3:15-cv-03708-EMC

**STIPULATION AND ~~[PROPOSED]~~
 ORDER RE: DISCOVERY**

20 TO THE CLERK OF THE COURT AND THE HONORABLE JUDGE EDWARD M. CHEN:

21 Having met and conferred, Plaintiffs Chris Romo and Dulia Romo (the “plaintiffs”) and
 22 Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) enter into the below stipulation and hereby
 23 request that the Court enter the accompanying proposed order.

24 Plaintiffs and Wells Fargo, by and through their respective counsel, jointly stipulate as
 25 follows:
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1 WHEREAS, the Plaintiffs served Defendants with discovery requests on November 18,
2 2016;

3 WHEREAS, Defendants served Plaintiffs with discovery requests on December 21, 2016;

4 WHEREAS, Defendants have yet to respond to Plaintiffs' discovery requests;

5 WHEREAS, discovery cut-off is set for January 26, 2017, expert reports are due by
6 January 26, 2017, rebuttal reports are due by February 16, 2017, and expert discovery cut-off is
7 set for March 9, 2017.

8 WHEREAS, Defendants have indicated they wish to depose Plaintiffs but no date has
9 been set yet.

10 NOW IT IS HEREBY STIPULATED AND AGREED by and between Defendants and
11 Plaintiffs, through their undersigned counsel of record that:

- 12 1. Fact Discovery cut-off will now be February 26, 2017.
- 13 2. Initial Expert Reports will now be due on February 26, 2017.
- 14 3. Rebuttal Reports will now be due on March 16, 2017.
- 15 4. Expert Discovery cut-off will now be April 9, 2017.

16 **IT IS SO STIPULATED.**
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18
19 Dated: January 4, 2017

/s/ Nelson Goodell
NELSON W. GOODELL,
Attorney for Plaintiff, CHRIS ROMO
and MARIA DULIA ROMO

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22 Approved as to form and content:

23
24 Dated: January 4, 2017

/s/ Videll Lee Heard
VIDDELL LEE HEARD,
Attorney for Wells Fargo

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CERTIFICATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that I have obtained concurrence from Defendant’s counsel for the filing of this document.

Dated: January 4, 2017

 /s/ Nelson W. Goodell
NELSON W. GOODELL,
Attorney for Plaintiffs

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ORDER

Fact Discovery and initial Expert Reports will now be due on February 26, 2017. Rebuttal Reports will be due March 16, 2017, and Expert Discovery cut-off will be moved to April 9, 2017. All other dates remain the same.

IT IS SO ORDERED.

Dated: 1/10/2017

