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13	ROBERT S. PECK (admitted <i>pro hac vice</i> )	Attorneys for WELLS FARGO & CO. and	
14	robert.peck@cclfirm.com CENTER FOR CONSTITUTIONAL	WELLS FARGO BANK, N.A.	
14	LITIGATION		
15	777 6th Street NW, Suite 250		
	Washington, DC 20001		
16	Telephone: (202) 944-2803		
17	Attorneys for Plaintiff CITY OF OAKLAND		
- /			
18			
10	UNITED STATES	DISTRICT COURT	
19	NOTHERN DISTRICT OF CALIFORNIA		
20	TOTILA BISTA		
	CITY OF OAKLAND, a municipal	Case No. 3:15-cv-04321-EMC	
21	corporation,		
22	Plaintiff,	SECOND STIPULATION TO EXTEND	
	Tranium,	TIME FOR PLAINTIFF TO FILE	
23	vs.	AMENDED COMPLAINT OR MOTION	
		FOR LEAVE TO FILE THE FIRST	
24	WELLS FARGO & CO. and WELLS FARGO	AMENDED COMPLAINT	
25	BANK, N.A.	[Local Civ. R. 6-2 — [Proposed] Order filed	
23	Defendants.	simultaneously herewith]	
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1	Plaintiff CITY OF OAKLAND, and Defendants WELLS FARGO & CO. and WELLS
2	FARGO BANK, N.A. (collectively hereinafter "Defendants"), through their respective counsel of
3	record, hereby stipulate as follows:
4	WHEREAS, a Case Management Conference was held on May 25, 2017;
5	WHEREAS, the Court ordered that Plaintiff shall file a stipulated amended complaint or a
6	motion for leave to file an amended complaint by June 26, 2017;
7	WHEREAS, Plaintiff desired additional time and the Parties stipulated and the Court
8	ordered that (1) Plaintiff provide Defendants with a draft First Amended Complaint by July 19,
9	2017; and (2) Plaintiff file either a Stipulated First Amended Complaint, or a Motion for Leave to
10	File the First Amended Complaint by July 26, 2017;
11	WHEREAS, Plaintiff has encountered further unexpected and unavoidable delays in
12	creating its First Amended Complaint; and
13	WHEREAS, the Parties have agreed that Plaintiff may have fourteen (14) additional days
14	to provide Defendants with a draft First Amended Complaint, and to file either a Stipulated First
15	Amended Complaint or a Motion for Leave to File the First Amended Complaint.
16	NOW THEREFORE, Plaintiff and Defendants, through their counsel of record, stipulate to
17	and respectfully request an order granting the following:
18	(1) Plaintiff will provide Defendants with a draft First Amended Complaint by August 2,
19	2017; and
20	(2) Plaintiff will file either a Stipulated First Amended Complaint or a Motion for Leave to
21	File the First Amended Complaint by August 9, 2017.
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1	DATED: July 21, 2017	PERETZ & ASSOCIATES
2		
3		By: /s/ Yosef Peretz
4		Yosef Peretz Attorneys for Plaintiff
5		CITY OF OAKLAND
6	DATED: July 21, 2017	PROSKAUER ROSE LLP
7		BART H. WILLIAMS MANUEL F. CACHÁN
8		
9		MUNGER, TOLLES & OLSON LLP TERRY E. SANCHEZ
		K&L GATES LLP
10		PAUL F. HANCOCK
11		
12		Den ( / D
13		By: /s/ Bart H. Williams
14		Attorneys for Defendants WELLS FARGO & CO. and
15		WELLS FARGO BANK, N.A.
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17	Attorneys for Plaintiff CITY OF OAKLAND			
18 19	UNITED STATES DISTRICT COURT			
20	NOTHERN DISTRICT OF CALIFORNIA			
21	CITY OF OAKLAND, a municipal corporation,	Case No. 3:15-cv-04321-EMC		
22	Plaintiff,	[PROPOSED] ORDER GRANTING		
23	VS.	SECOND STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE		
24	WELLS FARGO & CO. and WELLS FARGO BANK, N.A.	AMENDED COMPLAINT OR MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT		
25	Defendants.			
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[PROPOSED] ORDER

PURSUANT TO STIPULATION submitted by Plaintiff CITY OF OAKLAND, and Defendants WELLS FARGO & CO. and WELLS FARGO BANK, N.A., IT IS SO ORDERED as follows:

(1) Plaintiff will provide Defendants with a draft First Amended Complaint by August 2, 2017; and

(2) Plaintiff will file either a Stipulated First Amended Complaint, or a Motion for Leave to File the First Amended Complaint by August 9, 2017.

DATED: 7/24/17

How Poward M. Chen

IT IS SO ORDERED

Judge Edward M. Chen

Judge Edward M. Chen