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Attorneys for WELLS FARGO & CO. and
WELLS FARGO BANK, N.A.

18 UNITED STATES DISTRICT COURT
19
20 NOTHERN DISTRICT OF CALIFORNIA

21 CITY OF OAKLAND, a municipal
corporation,

22 Plaintiff,

23 vs.

24 WELLS FARGO & CO. and WELLS FARGO
BANK, N.A.

25 Defendants.
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Case No. 3:15-cv-04321-EMC

**SECOND STIPULATION TO EXTEND
TIME FOR PLAINTIFF TO FILE
AMENDED COMPLAINT OR MOTION
FOR LEAVE TO FILE THE FIRST
AMENDED COMPLAINT**

**[Local Civ. R. 6-2 — [Proposed] Order filed
simultaneously herewith]**

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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DATED: July 21, 2017

PERETZ & ASSOCIATES

By: /s/ Yosef Peretz

Yosef Peretz
Attorneys for Plaintiff
CITY OF OAKLAND

DATED: July 21, 2017

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By: /s/ Bart H. Williams

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WELLS FARGO BANK, N.A.

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**[PROPOSED] ORDER GRANTING
SECOND STIPULATION TO EXTEND
TIME FOR PLAINTIFF TO FILE
AMENDED COMPLAINT OR MOTION
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COMPLAINT**

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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

Hon. Edward M. Chen

