Doc 16

7

9

8

10 11

12 13

14 15

16

17

18

19 20

21

22

23 24

25

26

27

28

COMES NOW THE PARTIES TO THE ABOVE-REFERENCED ACTION AND **RECITE AND STIPULATE AS FOLLOWS:**

- 1. WHEREAS, on February 22, 2016, Defendant Lobel Financial Corp. ("Lobel") was served with the Complaint (see Dkt. No. 7);
- 2. WHEREAS, the Complaint alleges violations of the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. sections 227 et seq. in connection with calls allegedly placed to Plaintiff DANIEL GLANTZ's ("Plaintiff") cellular telephone. The Complaint also alleges violations of the TCPA on behalf of a putative class.
- 3. WHEREAS, by prior stipulation and order, Lobel's deadline to respond to the Complaint is currently April 13, 2016;
 - 4. WHEREAS, the Parties are discussing early resolution options;
- 5. WHEREAS, in light of the settlement discussions, the Parties agree that Lobel may have through April 27, 2016 to answer, move, or otherwise respond to the Complaint; and
- 6. WHEREAS, in the event that Lobel files a responsive motion, as opposed to an answer, then the Parties stipulate and request that Plaintiff shall have thirty (30) days to oppose said motion (i.e. through and including May 27, 2016) and Lobel will subsequently have two (2) weeks to file a reply brief (i.e. through and including June 10, 2016).

NOW THEREFORE THE PARTIES STIPULATE:

- 1. That Lobel may have through April 27, 2016 to respond to the complaint; and
- 2. In the event that Lobel files a responsive motion, as opposed to an answer, then the Parties jointly stipulate and request that Plaintiff shall have thirty (30) days to oppose said motion (i.e. through and including May 27, 2016) and Lobel will subsequently have two (2) weeks to file a reply brief (i.e. through and including June 10, 2016).

10431.0011/7248459.1

1	DATED: April 7, 2016	BURSOR & FISHER, P.A.
2		
3		
4		By: /s/ L. Timothy Fisher
5		L. Timothy Fisher
6		Attorneys for Plaintiff DANIEL GLANTZ, on Behalf of Himself and all Others Similarly Situated
7		
8	DATED: April 7, 2016	SEVERSON & WERSON A Professional Corporation
9		A Floressional Corporation
10		
11		By: /s/ Rebecca S. Saelao Rebecca S. Saelao
12		
13		Attorneys for Defendant LOBEL FINANCIAL CORP.
14		ORDER
15	Pursuant to the stipulation of the parties, Lobel's time to answer, move, or otherwise	
16	respond to the complaint is extended through April 27, 2016. Further, in the event that Lobel files	
17	a responsive motion, as opposed to an answer, then Plaintiff shall have thirty (30) days to oppose	
18	said motion (i.e. through and including May 27, 2016) and Lobel will subsequently have two (2)	
19	weeks to file a reply brief (i.e. through and including June 10, 2016).	
20	IT IS SO ORDERED.	
21	DATED: April 11, 2016	
22		
23		Haywood & Jell
24	Hon. Haywood S. Gilliam, Jr. 10 UNITED STATES DISTRICT JUDGE	
25		
26		
27		