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 9 EDUCATIONAL FINANCIAL  
 10 SOLUTIONS, LLC dba  
 11 CAMPUS DEBT SOLUTIONS

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA

12 WINIFRED CABINESS,  
 13  
 14 Plaintiff,  
 15 v.  
 16 EDUCATIONAL FINANCIAL SOLUTIONS,  
 17 LLC DBA CAMPUS DEBT SOLUTIONS,  
 18 and DOES 1-10,  
 19 Defendant.

) Case No. 3:16-cv-1109-JST  
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**STIPULATION AND [PROPOSED]  
 ORDER EXTENDING DEADLINE FOR  
 DEFENDANT TO FILE REPLY IN  
 SUPPORT OF MOTION TO DISMISS**

20 This Stipulation is entered into by Plaintiff Winifred Cabiness (“Plaintiff”) and  
 21 Defendant Educational Financial Solutions, LLC d/b/a Campus Debt Solutions (“Defendant”),  
 22 by and through their respective counsel.

23 WHEREAS, on March 4, 2016, Plaintiff filed her Complaint in the above-entitled action  
 24 in the United States District Court, Northern District of California;

25 WHEREAS, on June 6, 2016, Defendant filed its Notice of Motion and Motion to  
 26 Dismiss or, in the Alternative, to Stay the Action, and Memorandum of Points & Authorities  
 27 (“Defendant’s Motion to Dismiss) (Dkt. No. 24);

28 WHEREAS, on June 20, 2016, Plaintiff filed her Response to Defendant’s Motion to

1 Dismiss (“Plaintiff’s Response to Defendant’s Motion to Dismiss”) (Dkt. No. 29);

2 WHEREAS, Defendant’s Reply in support of Defendant’s Motion to Dismiss is  
3 currently due on Monday, June 27, 2016;

4 WHEREAS, the hearing on Defendant’s Motion to Dismiss is currently scheduled for  
5 August 4, 2016;

6 WHEREAS, Defendant seeks a short extension of four days until Friday, July 1, 2016 to  
7 file a Reply in support of Defendant’s Motion to Dismiss;

8 WHEREAS, local counsel handling this matter as well as the associate from lead  
9 counsel’s office handling this matter will both be out of the office from June 23, 2016 until June  
10 27, 2016 on previously scheduled vacations;

11 WHEREAS, Plaintiff’s counsel has agreed and has no objection to Defendant’s request  
12 for a short extension of time for Defendant to file its Reply in Support of Defendant’s Motion to  
13 Dismiss; and

14 WHEREAS, the Parties agree that a short extension of time for Defendant to file its  
15 Reply in Support of Defendant’s Motion to Dismiss will have no impact on the scheduling of  
16 this matter as the hearing on Defendant’s Motion to Dismiss is not until August 4, 2016 and  
17 therefore, even with the extension, Defendant’s Reply in Support of Defendant’s Motion to  
18 Dismiss will still be due five (5) weeks before the hearing on Defendant’s Motion to Dismiss;

19 WHEREAS, Defendant has not previously sought an extension of time to file its Reply  
20 in Support of Defendant’s Motion to Dismiss;

21 WHEREAS, the Parties have sought and the Court has granted two continuances of the  
22 Case Management Conference which is now scheduled for August 4, 2016;

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1 NOW, THEREFORE, pursuant to Civil Local Rule 6-2(a), the Parties stipulate and  
2 agree, through their respective counsel that the deadline for Defendant to file its Reply in  
3 Support of Defendant's Motion to Dismiss shall be extended until July 1, 2016.

4 **IT IS SO STIPULATED.**

5  
6 Dated: June 22, 2016

7 EAST BAY COMMUNITY  
8 LAW CENTER

Nossaman LLP

9 /s/ Sharon Djemal

/s/ James H. Vorhis

10 Sharon Djemal  
11 Attorney for Plaintiff

James H. Vorhis  
Attorneys for Defendant

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14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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16 DATED: June 22, 2016

  
THE HONORABLE JON S. TIGAR

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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

I, James H. Vorhis, attest that concurrence in the filing of this Stipulation Extending Deadline for Defendant to file its Reply in Support of Defendant’s Motion to Dismiss has been obtained from the other signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed June 22, 2016, at San Francisco, California.

NOSSAMAN LLP

/s/ James H. Vorhis