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Attorneys for Plaintiff WINIFRED CABINESS and the putative class

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

WINIFRED CABINESS, individually and
 on behalf of all others similarly situated,

Plaintiff,

vs.

EDUCATIONAL FINANCIAL
 SOLUTIONS, LLC dba CAMPUS DEBT
 SOLUTIONS,

Defendant.

Case No. 3:16-cv-01109-JST

**STIPULATION AND PROPOSED
 ORDER TO GRANT PLAINTIFF
 LEAVE TO AMEND AND TO
 CONTINUE EDUCATIONAL
 FINANCIAL SOLUTIONS, LLC DBA
 CAMPUS DEBT SOLUTIONS'S
 DEADLINE TO RESPOND TO THE
 COMPLAINT**

Action Filed: March 4, 2016
 Trial Date: None Set

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

1. WHEREAS, Plaintiff initiated this lawsuit on March 4, 2016;
2. WHEREAS, Plaintiff filed a First Amended Complaint by way of stipulation on September 23, 2016.

1 3. WHEREAS, Plaintiff has expressed a desire to amend the Complaint.

2 4. WHEREAS, to avoid unnecessary litigation expense, and without waiving any
3 defenses and/or opposition to any of the claims and/or class allegations, the Parties agree that
4 Plaintiff may file a Second Amended Complaint on or before March 24, 2017 and Defendant
5 Educational Financial Solutions, LLC dba Campus Debt Solutions may have through June 19,
6 2017 to answer, move, or otherwise respond to the Second Amended Complaint.

7 **NOW THEREFORE THE PARTIES STIPULATE:**

8 1. Plaintiff may file a Second Amended Complaint on or before March 24, 2017.

9 2. Educational Financial Solutions, LLC dba Campus Debt Solutions may have
10 through June 19, 2017 to answer, move, or otherwise respond to the Second Amended
11 Complaint.

12 Dated: March 22, 2017

KEMNITZER, BARRON & KRIEG, LLP

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By: /s/ Elliot Conn
ELLIOT CONN
Attorneys for Plaintiff

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16 Dated: March 22, 2017

NOSSAMAN LLP

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By: /s/ James H. Vorhis
JAMES H. VORHIS
BETH-ANN KRIMSKY (admitted pro hac vice)
Attorneys for Defendant EDUCATIONAL
FINANCIAL SOLUTIONS, LLC dba CAMPUS
DEBT SOLUTIONS

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ORDER

Pursuant to the Parties' stipulation,

1. Plaintiff may have through March 24, 2017 to file a Second Amended Complaint

2. Educational Financial Solutions, LLC dba Campus Debt Solutions may have
through June 19, 2017 to answer, move, or otherwise respond to the Second Amended
Complaint.

IT IS SO ORDERED.

Dated: March 22, 2017


HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE