

1 J. NELSON THOMAS (admitted pro hac vice)
 JONATHAN W. FERRIS (admitted pro hac vice)
 2 MICHAEL J. LINGLE (admitted pro hac vice)
 ANNETTE M. GIFFORD - 270777
 3 THOMAS & SOLOMON LLP
 4 693 East Avenue
 Rochester, New York 14607
 5 Telephone: (585) 272-0540
 Email: nthomas@theemploymentattorneys.com
 6 jferris@theemploymentattorneys.com
 nthomas@theemploymentattorneys.com
 7 amgifford@gmail.com

8 SANFORD JAY ROSEN – 062566
 9 VAN SWEARINGEN – 259809
 ROSEN BIEN GALVAN & GRUNFELD LLP
 10 50 Fremont Street, 19th Floor
 San Francisco, California 94105-2235
 11 Telephone: (415) 433-6830
 12 Facsimile: (415) 433-7104
 Email: srosen@rbgg.com
 13 vswearingen@rbgg.com

14 Attorneys for
 15 RELATOR GWEN THROWER

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

18 UNITED STATES OF AMERICA ex rel.
 GWEN THROWER,
 19 Plaintiff,
 20 v.
 21 ACADEMY MORTGAGE CORPORATION,
 22 Defendant.
 23

Case No. 16-CV-02120-EMC

**STIPULATION AND PROPOSED ORDER
 EXTENDING RELATOR’S TIME TO
 AMEND THE COMPLAINT AND
 SETTING BRIEFING SCHEDULES FOR
 MOTION TO DISMISS THE AMENDED
 COMPLAINT AND DEFENDANT’S
 MOTION TO TRANSFER**

Judge: Hon. Edward M. Chen

1 Relator Gwen Thrower and Defendant Academy Mortgage Corporation hereby stipulate by
2 and through their respective counsel as follows:

3 1. Whereas the current deadline for Relator to respond to Defendant's Motion to
4 Dismiss Relator's Complaint, for Relator to file an amended complaint, and to respond to
5 Defendant's Motion to Transfer is April 6, 2017. Under the current schedule, the deadlines for
6 defendant's replies regarding these motions is April 20, 2017.

7
8 2. These deadlines were previously extended by this Court on March 20, 2017 pursuant
9 to a stipulation between the parties. This was the first and only extension of these deadlines.

10 3. Whereas Relator now intends to amend her Complaint therefore mooting
11 Defendant's current Motion to Dismiss. The anticipated amended complaint may also cause
12 Defendant to amend or re-file its Motion to Transfer.

13 4. An extension of these deadlines is requested in order to allow Relator time to
14 sufficiently prepare an amended complaint. This request is also necessitated by a recent death in
15 the family of one of Relator's attorneys and out of country travel for two weeks in April of another
16 of Relator's attorneys.

17 5. Whereas the parties have conferred and propose the following schedule in light of
18 the above:

19 **April 27, 2017:** Deadline for Relator to file an Amended Complaint

20 **May 25, 2017:** Deadline for Defendant to file Motion to Dismiss the Amended
21 Complaint and Amended Motion to Transfer

22 **June 22, 2017:** Deadline for Relator to File Responses to Motion to Dismiss
23 Amended Complaint and Motion to Transfer

24 **June 30, 2017:** Deadline for Defendant to File Replies to Motion to Dismiss
25 Amended Complaint and Motion to Transfer

26 6. A hearing regarding the motion to dismiss and motion to transfer is currently
27 scheduled for May 4, 2017 at 1:30 p.m. The parties respectfully request that the Court reschedule
28 oral argument in this matter for a time that is convenient for the Court in light of the above

1 schedule.

2 7. Additionally, a case management conference in this action is currently set for April
3 27, 2017 at 1:30 p.m. In light of the proposed schedule above, the parties respectfully request that
4 the case management conference be rescheduled for the same date and time that the Court sets for
5 oral argument on the Motion to Dismiss the Amended Complaint and Motion to Transfer.

6 8. IT IS HEREBY STIPULATED that, upon approval by the Court, the deadlines are
7 extended as set forth above in Paragraph Five.

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10 Dated: April 4, 2017

11 By: /s/ Jonathan W. Ferris
12 J. Nelson Thomas
13 Michael J. Lingle
14 Jonathan W. Ferris
15 Annette M. Gifford
16 THOMAS & SOLOMON LLP
17 693 East Avenue
Rochester, NY 14607
Telephone: 585-272-0540
Facsimile: 585-272-0574

18 Sanford Jay Rosen
19 Van Swearingen
20 ROSEN BIEN GALVAN &
21 GRUNFELD LLP
22 50 Fremont Street
23 19th Floor
24 San Francisco, CA 94105

25 Counsel for Relator

By: /s/ Jason W. McElroy
Jason W. McElroy
WEINER BRODSKY KIDER PC
1300 19th Street, N.W.
Suite 500
Washington, DC 20036
202-628-2000
Fax: 202-628-2011
Email: mcelroy@thewbkfirm.com

Thomas Michael McInerney
OGLETREE DEAKINS NASH SMOAK
& STEWART, P.C.
Steuart Tower, Suite 1300
One Market Plaza
San Francisco, CA 94105
415-442-4810
Fax: 415-442-4870
Email: tmm@ogletree.com

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Counsel for Defendant

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA ex rel.
GWEN THROWER,

Plaintiff,

v.

ACADEMY MORTGAGE CORPORATION,

Defendant.

Case No. 16-CV-02120-EMC

**[PROPOSED] ORDER EXTENDING
RELATOR'S TIME TO AMEND THE
COMPLAINT AND SETTING BRIEFING
SCHEDULES FOR MOTION TO
DISMISS THE AMENDED COMPLAINT
AND DEFENDANT'S MOTION TO
TRANSFER**

Judge: Hon. Edward M. Chen

1 Upon consideration of the parties' stipulation to extend the time for Relator to amend her
2 complaint and the parties' proposed briefing schedule regarding Defendant's Motion to Dismiss
3 the Amended Complaint and Motion to Transfer, IT IS HEREBY ORDERED that the stipulation
4 is GRANTED as follows:

- 5 1. Relator's Amended Complaint is now due on **April 27, 2017**;
- 6 2. Defendant's deadline to file a Motion to Dismiss the Amended Complaint and an
7 Amended/Renewed Motion to Transfer is due on **May 25, 2017**;
- 8 3. Relator's Deadline to File Responses to Motion to Dismiss Amended Complaint and
9 Amended Motion to Transfer is **June 22, 2017**;
- 10 4. Defendant's Replies to Motion to Dismiss the Amended Complaint and Amended
11 29
12 Motion to Transfer are **June 30, 2017**;
- 13 5. The oral argument currently set for May 4, 2017 at 1:30 p.m. is rescheduled for a ~~date~~
14 July 13, 2017 at 1:30 p.m.
15 and time that is convenient for the Court in light of the above briefing schedule.
- 16 6. The case management conference currently scheduled for April 27, 2017 at 1:30 p.m. is
17 rescheduled for the ~~same date and time that the Court sets for oral argument on the~~
18 ~~Motion to Dismiss the Amended Complaint and Motion to Transfer~~ July 13, 2017

at 1:30 p.m.

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23 4/5/2017
24 Dated: _____

