

1 Balam O. Letona, Esq. (Cal. Bar No. 229642)  
 2 Law Office of Balam O. Letona, Inc.  
 3 1509 Seabright Avenue, Suite C1  
 4 Santa Cruz, CA 95062  
 5 Telephone: (831) 421-0200  
 6 Facsimile: (831) 421-0400  
 7 [balam@letonalaw.com](mailto:balam@letonalaw.com)

8 Luke Wallace  
 9 Robert David Humphreys  
 10 HUMPHREYS WALLACE HUMPHREYS, P.C.  
 11 9202 S. Toledo Avenue  
 12 Tulsa, OK 74137  
 13 luke@hwh-law.com  
 14 david@hwh-law.com  
 15 *Pro Hac Vice*

16 Attorney for Plaintiff:  
 17 Cynthia Todd

18 **IN THE UNITED STATES DISTRICT COURT**  
 19 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

20 CYNTHIA TODD,

21 Plaintiff,

22 vs.

23 AT&T CORP., EQUIFAX INFORMATION  
 24 SERVICES LLC., NATIONAL CONSUMER  
 25 TELECOM and UTILITIES EXCHANGE, INC.,  
 26 EXPERIAN INFORMATION SOLUTIONS INC.,  
 27 and DOES 1-10.

28 Defendants.

**Case No. 16-cv-03357-HSG**

**STIPULATION AND ORDER  
 EXTENDING TIME FOR  
 EXPERT DESIGNATIONS**

The deadline to designate experts with reports expires on February 15, 2017. Though Plaintiff propounded discovery and the Defendants have responded to that discovery the

1 parties are meeting and conferring with respect to the adequacy of those responses and the  
2 lack of production of certain documents. Additionally, Plaintiff still seeks the deposition of  
3 Defendants PMK witnesses and others. As such, Plaintiff is unable to meaningfully evaluate  
4 whether to retain an expert without the required discovery and any retained expert will need  
5 the outstanding discovery. As such, the parties agree and stipulate to change the last day to  
6 designate experts with reports from February 15, 2017 to March 17, 2017. All other dates to  
7 remain the same.

8 **SO STIPULATED:**

9 Dated: January 30, 2017

AT&T SERVICES, INC. - LEGAL  
DEPARTMENT

11 By: /s/ Robert B. Mullen  
12 Robert B. Mullen  
13 Attorneys for Defendant  
AT&T CORP.

14 Dated: January 29, 2017

JONES DAY

17 By: /s/ Andrew H. Dubin  
18 Andrew H. Dubin  
19 Attorney for Defendant Experian Information  
Solutions, Inc.

20 Dated: January 29, 2017

KING & SPAULDING LLP

22 By: /s/ J. Anthony Love  
23 J. Anthony Love  
24 Attorney for Defendant Equifax Information  
Solutions, Inc., and NCTUE

1 Dated: January 29, 2017

LAW OFFICE OF BALAM O. LETONA, INC.

2  
3 By: /s/ Balam O. Letona  
4 Balam O. Letona  
5 Attorney for Plaintiff  
6 CYNTHIA TODD

7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

8  
9 DATED: January 31, 2017



10 United States District