

1 Abraham J. Colman (SBN 146933)  
 Email: acolman@reedsmith.com  
 2 Raymond Y. Kim (SBN 251210)  
 rkim@reedsmith.com  
 3 REED SMITH LLP  
 355 South Grand Avenue, Suite 2900  
 4 Los Angeles, CA 90071-1514  
 Telephone: +1 213 457 8000  
 5 Facsimile: +1 213 457 8080

6 Le T. Duong (SBN 297662)  
 lduong@reedsmith.com  
 7 REED SMITH LLP  
 101 Second Street, Suite 1800  
 8 San Francisco, CA 94105-3659  
 Telephone: +1 415 543 8700  
 9 Facsimile: +1 415 391 8269

10 Attorneys for Defendant  
 Barclays Bank Delaware

11  
 12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION  
 14

REED SMITH LLP  
 A limited liability partnership formed in the State of Delaware

16 OLIVER CRISTOBAL,

17 Plaintiff,

18 v.

19 Experian Information Solutions, Inc.; Equifax,  
 20 Inc.; Credit First, National Association; Barclay's  
 21 Bank Delaware and DOES 1 through 100  
 inclusive,

22 Defendants.  
 23

Case No. 3:16-cv-06328-RS

**STIPULATION TO EXTEND BARCLAYS  
 BANK DELAWARE'S TIME TO FILE  
 RESPONSE IN SUPPORT OF MOTION TO  
 DISMISS PLAINTIFF'S COMPLAINT  
 AND ~~[PROPOSED]~~ ORDER**

Date: March 16, 2017  
 Time: 1:30 p.m.  
 Place: Courtroom 3

Compl. Filed: November 1, 2016

Honorable Judge Richard Seeborg

[L.R. 6-2]

28 Case No. 3:16-cv-06328-RS

JOINT STIPULATION TO EXTEND BARCLAYS BANK DELAWARE'S TIME TO FILE RESPONSE IN  
 SUPPORT OF MOTION TO DISMISS PLAINTIFF'S COMPLAINT AND [PROPOSED] ORDER

1 This Stipulation to Extend Time to File Response in support of Motion to Dismiss Complaint  
2 is made by and between Plaintiff Oliver Cristobal (“Plaintiff”) and Defendant Barclays Bank  
3 Delaware (“Barclays”) (collectively the “Parties”) through their respective counsel, in light of the  
4 following facts:

5 **RECITALS**

6 On December 5, 2016, Barclays filed a Motion to Dismiss Plaintiff’s Complaint with a  
7 noticed hearing date of March 16, 2017;

8 On December 19, 2016, Plaintiff filed an Opposition to Barclays’ Motion to Dismiss;  
9 Barclays’ Response in support of the Motion to Dismiss is due on or before December 27,  
10 2016;

11 The Parties have reached a settlement in this matter and are in the process of preparing the  
12 settlement agreement;

13 The Parties agree to extend Barclays’ time to file a Response in support of the Motion to  
14 Dismiss by 30 days to January 26, 2017 so that the Parties can prepare and execute the settlement  
15 agreement and file a Stipulation to Dismiss Barclays from this action with prejudice;

16 This extension will not affect the scheduled hearing date for the Motion to Dismiss on March  
17 16, 2017;

18 There is good cause to grant this Joint Motion because the Parties require additional time to  
19 prepare and execute the settlement agreement and file a Stipulation to Dismiss Barclays from this  
20 action with prejudice within the next 30 days.

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1 **STIPULATION**

2 Pursuant to Civil Local Rule 6-2, Plaintiff and Barclays stipulate and respectfully request that  
3 Barclays' deadline to file a Response in Support of the Motion to Dismiss be extended to Thursday,  
4 January 26, 2017.

5  
6 DATED: December 27, 2016

REED SMITH LLP

7  
8 By: /s/ Le T. Duong  
9 Le T. Duong  
10 *Attorney for Defendant*  
11 Barclays Bank Delaware  
12 lduong@reedsmith.com

13 DATED: December 27, 2016

SAGARIA LAW, P.C.

14 By: /s/ Elliot w. Gale  
15 Elliot W. Gale  
16 *Attorney for Plaintiff*  
17 Oliver Cristobal

REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

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~~[PROPOSED]~~ ORDER

PURSUANT TO THE STIPULATION, AND FOR GOOD CAUSE SHOWING, IT IS SO ORDERED that Barclays Bank Delaware's deadline to file a Response in support of the Motion to Dismiss Plaintiff Oliver Cristobal's Complaint is extended to January 26, 2017.

Dated: 1/25/17

  
The Honorable Richard Seeborg  
United States District Judge