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6	Attorneys for Defendant EXPERIAN INFORMATION SOLUTIONS, INC.	
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8	UNITED STATES	DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA	
10	JANET PERKINS,	Case No. 3:16-cv-06347-MMC
11	Plaintiff,	Assigned to: Judge Maxine M. Chesney
12	V.	JOINT STIPULATION AND
13	EXPERIAN INFORMATION SOLUTIONS,	<del>[PROPOSED]</del> ORDER FOR EXTENSION OF TIME TO RESPOND
14	INC.; ET AL.,	TO COMPLAINT
15	Defendants.	
16		
17		
18	Plaintiff Janet Perkins ("Plaintiff") filed her Complaint in this action on November 1,	
19	2016 and served Defendant Experian Information Solutions ("Experian") on November 22, 2016,	
20	at the same time that Plaintiff's attorney served numerous other complaints on Experian. Given	
21	the large volume of complaints requiring a response from Experian at the same time, and in	
22	accordance with Local Rule 6-1(a), Plaintiff and Experian have agreed to an extension for	
23	Experian to answer or otherwise respond to the Complaint to February 1, 2017. To the extent that	
24	Experian files a motion to dismiss in this case, for the same considerations, Experian agrees that	
25	Plaintiff shall have 30 days to respond. Experian will thereupon have 21 days for any reply.	
26	Accordingly, IT IS HEREBY STIPULATED by and between Plaintiff and Experian, that	
27	the deadline for Experian to answer or otherwise respond to the Complaint is extended until	
28	February 1, 2017, Plaintiff's deadline to respond to any motion to dismiss is extended to 30 days	
		JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT Case No. 3:16-cv-06347-MMC

1	from filing, and Experian's deadline to reply in support of a motion to dismiss is extended to 21	
2	days from filing the opposition.	
3		
4	Dated: December 5, 2016 /s/Elliot W. Gale	
5	Elliot W. Gale (SBN 263326) SAGARIA LAW, P.C.	
6	2033 Gateway Place, 5th Floor San Jose, CA 95110 Tele.: (408) 279-2288	
7	Fax: (408) 279-2299 Email: egale@sagarialaw.com	
8 9	Attorneys for Plaintiff Janet Perkins	
10		
11	Dated: December 5, 2016 /s/ Valerie McConnell	
12	Valerie McConnell (State Bar No. 274159) JONES DAY	
13	1755 Embarcadero Road Palo Alto, CA 94303	
14	Tele.: (650) 739-3939 Fax: (650) 739-3900	
15	Email: vmcconnell@jonesday.com	
16	Attorneys for Defendant	
17	Experian Information Solutions, Inc.	
18	ECF CERTIFICATION	
19	I, Valerie McConnell, hereby attest pursuant to N.D. Cal. General Order No. 45 that the	
20	concurrence to the filing of this document has been obtained from each signatory hereto.	
21	Executed this 5th day of December, 2016, at Palo Alto, California.	
22		
23	/s/ Valerie McConnell	
24	Valerie McConnell (State Bar No. 274159) JONES DAY	
25	1755 Embarcadero Road Palo Alto, CA 94303	
26	Tele.: (650) 739-3939 Fax: (650) 739-3900	
27	Email: vmcconnell@jonesday.com	
28	Attorneys for Defendant Experian Information Solutions, Inc.	
	JOINT STIP AND [PROPOSED] ORDER FOR EXT OF	

## |PROPOSED|-ORDER The Court, having considered the parties' Joint Stipulation for Extension of Time to extends Inc.'s Respond to the Complaint, hereby Extend Experian Information Solutions, Inc. deadline to answer or otherwise respond to the Complaint to February 1, 2017. PURSUANT TO THE STIPULATION, IT IS SO ORDERED. It is further ordered that, in the event a motion to dismiss is filed, the parties' proposed briefing schedule shall apply. DATED: December 6, 2016 The Honorable Maxine M. Chesney United States District Judge