

1 Heather N. Fugitt (SBN 261588)
 hfugitt@jonesday.com
 2 JONES DAY
 Silicon Valley Office
 3 1755 Embarcadero Road
 Palo Alto, CA 94303
 4 Telephone: +1.650.739.3939
 5 Facsimile: +1.650.739.3900

6 Attorneys for Defendant
 7 EXPERIAN INFORMATION SOLUTIONS, INC.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

12 MARCO RODRIGUEZ,

13 Plaintiff,

14 v.

15 EXPERIAN INFORMATION SOLUTIONS,
 INC.; ET AL.,

16 Defendants.
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Case No. 3:16-cv-06380-EMC

Assigned to: Edward M. Chen

**SECOND JOINT STIPULATION AND
 [PROPOSED] ORDER FOR
 EXTENSION OF TIME TO RESPOND
 TO COMPLAINT**

20 On November 1, 2016, Plaintiff Marco Rodriguez (“Plaintiff”) filed a Complaint in this
 21 action, one of many Complaints filed by Plaintiff’s counsel on the same day. Shortly thereafter,
 22 Plaintiff and Experian agreed to an extension for Experian to answer or otherwise respond to the
 23 Complaint by January 24, 2017.

24 In accordance with Local Rule 6-1(a), Plaintiff and Experian now agree to a second
 25 extension for Experian to answer or otherwise respond to the Complaint. Experian’s response to
 26 Plaintiff’s Complaint is due February 28, 2017. To the extent that Experian files a motion to
 27 dismiss in this case, Experian agrees that Plaintiff shall have 30 days to respond. Experian will
 28 thereupon have 21 days for any reply.

1 This further extension is necessary given Experian's pending motion to consolidate this
2 case with the many other cases filed by Plaintiff's counsel, as well as Experian's pending motions
3 to dismiss numerous other Complaints filed by Plaintiff's counsel, which raise legal issues that
4 are identical to the ones presented by Plaintiff's Complaint.

5 Accordingly, IT IS HEREBY STIPULATED by and between Plaintiff and Experian, that
6 the deadline for Experian to answer or otherwise respond to the Complaint is extended until
7 February 28, 2017. Plaintiff's deadline to respond to any motion to dismiss is extended to 30
8 days from filing, and Experian's deadline to reply in support of a motion to dismiss is extended to
9 21 days from filing the opposition.

10
11 Dated: January 9, 2017

/s/ Elliot W. Gale

Elliot W. Gale (SBN 263326)
SAGARIA LAW, P.C.
2033 Gateway Place, 5th Floor
San Jose, CA 95110
Tele.: (408) 279-2288
Fax: (408) 279-2299
Email: egale@sagarialaw.com

Attorneys for Plaintiff
Marco Rodriguez

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18 Dated: January 9, 2017

/s/ Heather N. Fugitt

Heather N. Fugitt (SBN 261588)
JONES DAY
1755 Embarcadero Road
Palo Alto, CA 94303
Tele.: (650) 739-3939
Fax: (650) 739-3900
Email: hfugitt@jonesday.com

Attorneys for Defendant
Experian Information Solutions, Inc.

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ECF CERTIFICATION

I, Heather N. Fugitt, hereby attest pursuant to Local Rule 5-1(i)(3) that the concurrence to the filing of this document has been obtained from each signatory hereto.

Executed this 9th day of January, 2017, at Palo Alto, California.

/s/ Heather N. Fugitt
Heather N. Fugitt (SBN 261588)
JONES DAY
1755 Embarcadero Road
Palo Alto, CA 94303
Tele.: (650) 739-3939
Fax: (650) 739-3900
Email: hfugitt@jonesday.com

Attorneys for Defendant
Experian Information Solutions, Inc.

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[~~PROPOSED~~] ORDER

The Court, having considered the parties’ Second Joint Stipulation for Extension of Time to Respond to the Complaint, hereby extends Experian Information Solutions, Inc.’s (“Experian”) deadline to answer or otherwise respond to the Complaint to February 28, 2017. Plaintiff’s deadline to respond to any motion to dismiss is extended to 30 days from filing, and Experian’s deadline to reply in support of a motion to dismiss is extended to 21 days from filing the opposition.

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: 1/27/17

The Honorable Judge Edward M. Chen
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

