

Katherine Carlton Robinson, Esq. (IN #31694-49)
(admitted *Pro Hac Vice*)
Schuckit & Associates, P.C.
4545 Northwestern Drive
Zionsville, IN 46077
Telephone: 317-363-2400
Fax: 317-363-2257
E-Mail: krobinson@schuckitlaw.com

Lead Counsel for Defendant Trans Union, LLC

David Streza, Esq. (CSB #209353)
Vogl Meredith Burke LLP
456 Montgomery Street, 20th Floor
San Francisco, CA 94104
Telephone: 415-398-0200
Fax: 415-398-2820
E-Mail: dstreza@vmbllp.com

Local Counsel for Defendant Trans Union, LLC

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

NICOLAS A. AGUILAR, Plaintiff,)	CASE NO. 4:17-cv-00211-JST
)	
vs.)	STIPULATION AND
)	[PROPOSED] ORDER TO
)	EXTEND ADR DEADLINE
CAPITAL ONE FINANCIAL CORPORATION; EXPERIAN INFORMATION SOLUTIONS, INC.;)	
EQUIFAX INFORMATION SERVICES, LLC;)	
and TRANS UNION, LLC,)	
Defendants.)	

Defendants Trans Union, LLC (“Trans Union”), Experian Information Solutions, Inc. (“Experian”), Equifax Information Services, LLC (“Equifax”), Capital One Bank (USA), N.A. (“Capital One”), erroneously sued as Capital One Financial Corporation, and Plaintiff (collectively, the “Parties”), by their respective counsel, hereby stipulate and respectfully request that the Court extend the alternative dispute resolution (“ADR”) deadline by 60 days. In support of this Stipulation, the Parties state:

STIPULATION AND ~~[PROPOSED]~~ ORDER TO EXTEND ADR DEADLINE – 4:17-CV-00211-JST

1
2 1. This case was filed on January 19, 2017. See Doc. No. 1.

3 2. Pursuant to the Court's Order Selecting ADR Process [Doc. No. 35], the Parties
4 are to complete ADR by June 28, 2017.

5 3. The Parties state that good cause exists to extend the deadline to complete ADR
6 as there has not yet been a Case Management Conference, the Parties are in the early stages of
7 discovery and are continuing to collect information relevant to the case, the Parties are engaging
8 in ongoing settlement discussions, and the Parties have thus far been unable to identify a
9 mediation date on which all Parties and the mediator are available.
10

11 4. The Parties request that the Court extend the ADR deadline by 60 days so that
12 they may have more time to engage in direct settlement negotiations and conduct necessary
13 discovery before completing ADR.
14

15 5. This is the first extension requested by any party.

16 WHEREFORE the Parties respectfully request that the Court extend the deadline to
17 complete ADR by 60 days.
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

Date: May 8, 2017

s/ Katherine Carlton Robinson

Katherine Carlton Robinson, Esq. (IN #31694-49)
(admitted *Pro Hac Vice*)
Schuckit & Associates, P.C.
4545 Northwestern Drive
Zionsville, IN 46077
Telephone: 317-363-2400
Fax: 317-363-2257
E-Mail: krobinson@schuckitlaw.com

Lead Counsel for Defendant Trans Union, LLC

David Streza, Esq. (CSB #209353)
Vogl Meredith Burke LLP
456 Montgomery Street, 20th Floor
San Francisco, CA 94104
Telephone: 415-398-0200
Fax: 415-398-2820
E-Mail: dstreza@vmbllp.com

Local Counsel for Defendant Trans Union, LLC

Date: May 7, 2017

s/ Matthew M. Loker

Matthew M. Loker (279939)
ml@kazlg.com
Kazerouni Law Group, APC
245 Fischer Avenue, Suite D1
Costa Mesa, CA
Telephone: (800) 400-6808
Facsimile: (800) 520-5523

Attorney for Plaintiff Nicolas Aguilar

Date: May 2, 2017

s/ Andrew M. Cummings

Andrew M. Cummings (State Bar No. 305081)
acummings@jonesday.com
JONES DAY
3161 Michelson Drive, Suite 800
Irvine, CA 92612.4408
Telephone: (949) 851-3939
Facsimile: (949) 553-7539

Attorneys for Defendant
EXPERIAN INFORMATION SOLUTIONS, INC.

1
2 Date: May 2, 2017

NOKES & QUINN

3 /s/ Thomas P. Quinn, Jr.

4 Thomas P. Quinn, Jr. (SBN 132268)
5 Nokes & Quinn APC
6 410 Broadway, Ste 200
7 Laguna Beach, CA 92651
8 Tel: (949) 376-3500
9 Fax: (949) 376-3070
10 Email: tquinn@nokesquinn.com

11 Attorneys for Defendant EQUIFAX
12 INFORMATION SERVICES LLC

13 Date: May 2, 2017

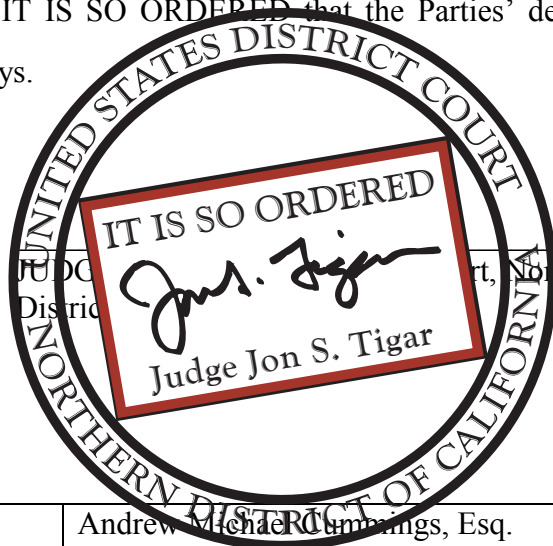
s/ Connie Y. Tcheng

14 Connie Y. Tcheng (State Bar No. 228171)
15 ctcheng@dollamir.com
16 DOLL AMIR & ELEY LLP
17 1888 Century Park East, Suite 1850
18 Los Angeles, CA 90067
19 Telephone: (310) 557-9100
20 Facsimile: (310) 557-9101

21 Attorneys for Defendant
22 CAPITAL ONE BANK (USA), N.A.

PURSUANT TO STIPULATION, IT IS SO ORDERED that the Parties' deadline to complete ADR is hereby extended by 60 days.

Date: May 16, 2017



DISTRIBUTION TO:

Andrei Armas, Esq. andrei@kazlg.com	Andrew Michael Cummings, Esq. acummings@jonesday.com
Connie Tcheng, Esq. ctcheng@dollarmir.com	David James Streza, Esq. dstreza@ymbllp.com
Hunter Randolph Eley, Esq. heley@dollarmir.com	Katherine E. Carlton Robinson, Esq. krobinson@schuckitlaw.com
Matthew M. Loker, Esq. ml@kazlg.com	Michael Frederick Cordoza, Esq. mike.cordoza@cardozalawcorp.com
Thomas P. Quinn, Jr., Esq. tquinn@nokesquinn.com	Sayed Abbas Kazerounian, Esq. ak@kazlg.com
Katherine Carlton Robinson, Esq. krobinson@schuckitlaw.com	