

1 Amir Q. Amiri (State Bar No. 271224)
 2 aamiri@jonesday.com
 3 JONES DAY
 4 555 California Street, 26th Floor
 5 San Francisco, CA 94104
 6 Telephone: (415) 626-3939
 7 Facsimile: (415) 875-5700

8 Attorneys for Defendant
 9 EXPERIAN INFORMATION SOLUTIONS, INC.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13 JESSILYN MANIMBAO,
 14 Plaintiff,
 15 v.
 16 EXPERIAN INFORMATION SOLUTIONS,
 17 INC.; ET AL.,
 18 Defendants.

Case No. 3:17-cv-00394-JST

Assigned to: Judge Jon S. Tigar

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER FOR
 EXTENSION OF TIME TO RESPOND
 TO COMPLAINT**

19
20
21
22
23
24
25
26
27
28

1 On January 25, 2017, Plaintiff Jessilyn Manimbao (“Plaintiff”) filed a Complaint in this
2 action. Given the large volume of Complaints requiring a response from Defendant Experian
3 Information Solutions, Inc. (“Experian”) at the same time, and in accordance with Local Rule 6-
4 1(a), Plaintiff and Experian agree to an extension for Experian to answer or otherwise respond to
5 the Complaint. Experian’s response to the Complaint is due April 3, 2017. To the extent that
6 Experian files a motion to dismiss in this case, Experian agrees that Plaintiff shall have 30 days to
7 respond. Experian will thereupon have 21 days for any reply.

8 Accordingly, IT IS HEREBY STIPULATED by and between Plaintiff and Experian, that
9 the deadline for Experian to answer or otherwise respond to the Complaint is extended until
10 April 3, 2017. Plaintiff’s deadline to respond to any motion to dismiss is extended to 30 days
11 from filing, and Experian’s deadline to reply in support of a motion to dismiss is extended to
12 21 days from filing the opposition.

13
14 Dated: March 3, 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
Jessilyn Manimbao

15
16
17
18
19
20 Dated: March 3, 2017

/s/ Amir Q. Amiri

Amir Q. Amiri (State Bar No. 271224)
JONES DAY
555 California Street, 26th Floor
San Francisco, CA 94104
Telephone: (415) 626-3939
Facsimile: (415) 875-5700
Email: aamiri@jonesday.com

Attorneys for Defendant
Experian Information Solutions, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ECF CERTIFICATION

I, Amir Q. Amiri, 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 on March 3, 2017, at San Francisco, California.

/s/ Amir Q. Amiri
Amir Q. Amiri (State Bar No. 271224)
JONES DAY

Attorneys for Defendant
Experian Information Solutions, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~PROPOSED~~ ORDER

The Court, having considered the parties’ 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 April 3, 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: March 7, 2017



The Honorable Judge Jon S. Tigar