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 WELLS FARGO BANK, N.A.
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9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION

11
 12 DAVID STRONG,

13 Plaintiff,

14 vs.

15 EXPERIAN INFORMATION SOLUTIONS,
 INC.; WELLS FARGO BANK, NATIONAL
 16 ASSOCIATION; TD BANK USA,
 NATIONAL ASSOCIATION AND DOES 1
 17 THROUGH 100 INCLUSIVE,

18 Defendants.
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Case No. 3:17-CV-00503-RS

**SECOND STIPULATION TO EXTEND
 TIME FOR DEFENDANT WELLS
 FARGO BANK, N.A. TO RESPOND TO
 INITIAL COMPLAINT AND
 [PROPOSED] ORDER**

20 Plaintiff DAVID STRONG (“Plaintiff”) and defendant WELLS FARGO BANK, N.A.,
 21 (“Defendant”), hereby stipulate as follows:

22 **RECITALS**

- 23 1. Plaintiff filed this action against Defendant on January 31, 2017 and served
 24 Defendant on February 2, 2017.
- 25 2. Defendant’s initial deadline to respond to the Complaint was February 23, 2017
- 26 3. Plaintiff and Defendant agreed to extend the time for Defendant to respond to the
 27 Complaint up to and including March 27, 2017, so that Defendant could have additional time to
 28

1 investigate this matter and the parties may explore the possibility of settlement.

2 4. On or about March 15, 2017, Plaintiff informed Defendant that he intended to file a
3 First Amended Complaint in the Action no later than April 7, 2017. Accordingly, Plaintiff and
4 Defendant agreed that Defendant’s deadline to respond to the complaint should be further
5 extended to, April 28, 2017, which is 21 days from the anticipated date of Plaintiff filing an
6 amended complaint.

7 This change in deadline will not alter the date of any event or any deadline already fixed
8 by Court order, local rules, or the Federal Rules of Civil Procedure.

9 THEREFORE, the parties stipulate as follows:

10 **STIPULATION**

11 1. The deadline for Defendant to respond to the Complaint or any amended complaint
12 filed by April 7, 2017, shall be continued to April 28, 2017.

13 2. This change in deadline will not alter the date of any event or any deadline already
14 fixed by Court order, local rules, or the Federal Rules of Civil Procedure.

15 **IT IS SO STIPULATED.**

16 DATED: March 17, 2017

SAGARIA LAW, P.C.

17 By: /s/ Elliot W. Gale
18 Elliot W. Gale

19 Attorneys for Plaintiff DAVID STRONG

20 DATED: March 17, 2017

SEVERSON & WERSON
A Professional Corporation

23 By: /s/ Alisa A. Givental
24 Alisa A. Givental

25 Attorneys for Defendants WELLS FARGO BANK,
26 N.A.

27 Pursuant to Local Rule 5-1(i)(3), I -- Alisa A. Givental – attest that concurrence in the filing of
28 this document has been obtained from Elliot W. Gale. /s/ Alisa A. Givental

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~~[PROPOSED]~~ ORDER

Pursuant to the stipulation of the parties and good cause appearing, Wells Fargo Bank, N.A.'s deadline to respond to plaintiff David Strong's Complaint or any amended complaint filed by April 7, 2017, is hereby continued to April 28, 2017. No other deadlines shall be affected by this Order.

IT IS SO ORDERED.

DATED: 3/17/17



HONORABLE RICHARD SEEBORG
UNITED STATES JUDGE