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6 Attorneys for Defendants  
7 WELLS FARGO BANK, N.A.

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION

10 DAVID STRONG,

11 Plaintiff,

12 vs.

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

16 Defendants.

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

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

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

20 **RECITALS**

- 21 1. Plaintiff filed this action against Defendant on January 31, 2017 and served  
22 Defendant on February 2, 2017.
- 23 2. Defendant’s initial deadline to respond to the Complaint was February 23, 2017
- 24 3. Plaintiff and Defendant agreed to extend the time for Defendant to respond to the  
25 Complaint up to and including March 27, 2017, so that Defendant could have additional time to  
26 investigate this matter and the parties may explore the possibility of settlement.
- 27 4. On or about March 15, 2017, Plaintiff informed Defendant that he intended to file a

1 First Amended Complaint in the Action no later than April 7, 2017. Accordingly, Plaintiff and  
2 Defendant agreed that Defendant's deadline to respond to the complaint should be further  
3 extended to, April 28, 2017, which was 21 days from the anticipated date of Plaintiff filing an  
4 amended complaint.

5 5. Plaintiff did not file an amended Complaint by April 7, 2017, but indicated his  
6 intention to do so in the near future. Accordingly, the parties agreed to extend Defendant's  
7 response deadline to May 26, 2017.

8 6. Plaintiff filed the First Amended Complaint on April 28, 2017. Based on the  
9 allegations in the First Amended Complaint and informal discovery, Plaintiff and Defendant are  
10 exploring settlement and stipulate that Defendant's deadline to respond to the First Amended  
11 Complaint shall be extended by another 31 days, up to and including June 26, 2017.

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

14 THEREFORE, the parties stipulate as follows:

15 **STIPULATION**

16 1. The deadline for Defendant to respond to the anticipated First Amended Complaint  
17 or, in the event no amended complaint is filed, the initial complaint, shall be up to and including  
18 June 26, 2017.

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

21 **IT IS SO STIPULATED.**

22 DATED: May 25, 2017

SAGARIA LAW, P.C.

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By:           /s/ Elliot W. Gale          

Elliot W. Gale

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Attorneys for Plaintiff DAVID STRONG

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1 DATED: May 25, 2017

SEVERSON & WERSON  
A Professional Corporation

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3  
4 By:           /s/ Alisa A. Givental            
  Alisa A. Givental

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6 Attorneys for Defendants WELLS FARGO BANK,  
N.A.

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

9  
10 **[PROPOSED] ORDER**

11 Pursuant to the stipulation of the parties and good cause appearing, Wells Fargo Bank,  
12 N.A.’s deadline to respond to the anticipated First Amended Complaint or, in the event no  
13 amended complaint is filed, the initial complaint, shall be up to and including June 26, 2017. No  
14 other deadlines shall be affected by this Order.

15 IT IS SO ORDERED.

16  
17 DATED:           5/26/17          



HONORABLE RICHARD SEEBORG  
UNITED STATES JUDGE