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

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO

10 EARLENE OTERO,  
 11 Plaintiff,  
 12 vs.  
 13 EXPERIAN INFORMATION SOLUTIONS,  
 14 INC.; WELLS FARGO BANK, NATIONAL  
 ASSOCIATION AND DOES 1 THROUGH  
 15 100 INCLUSIVE,  
 16 Defendant.

Case No. 3:17-CV-00508-EMC

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

17  
 18 Plaintiff EARLENE OTERO (“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
- 28 First Amended Complaint in the Action no later than April 7, 2017. Accordingly, Plaintiff and

1 Defendant agreed that Defendant's deadline to respond to the complaint should be further  
2 extended to, April 28, 2017, which was 21 days from the anticipated date of Plaintiff filing an  
3 amended complaint.

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

7 6. Plaintiff filed the First Amended Complaint on April 28, 2017. Plaintiff and  
8 defendant stipulated to extend the response deadline to June 26, 2017.

9 7. Based on the allegations in the First Amended Complaint and informal discovery,  
10 Plaintiff and Defendant are exploring settlement and stipulate that Defendant's deadline to respond  
11 to the First Amended Complaint shall be extended by another 30 days, up to and including July  
12 26, 2017.

13 8. 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 THEREFORE, the parties stipulate as follows:

16 **STIPULATION**

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

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

22 **IT IS SO STIPULATED.**

23 DATED: June 23, 2017

SAGARIA LAW, P.C.

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By:           /s/ Elliot W. Gale          

26

Elliot W. Gale

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Attorneys for Plaintiff EARLENE OTERO

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1 DATED: June 23, 2017

SEVERSON & WERSON  
A Professional Corporation

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

Attorneys for Defendants WELLS FARGO BANK,  
N.A.

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

~~[PROPOSED]~~ ORDER

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

IT IS SO ORDERED.

DATE:           6/27/17          

