1 2 3 4 5 6 7 8	 David C. Brownstein (Cal. Bar No. 141929) Farmer Brownstein Jaeger & Goldstein LLP 235 Montgomery Street, Suite 835 San Francisco, California 94104 Telephone: 415-962-2873 Facsimile: 415-520-5678 Local Counsel for Defendant American Express Company Howard S. Zelbo (<i>pro hac vice application forthcoming</i>) Roger A. Cooper (<i>pro hac vice application forthcoming</i>) Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, New York 10006 Telephone: 212-225-2000 Facsimile: 212-225-3999 			
9 10	Attorneys for Defendant American Express Company			
11	UNITED STATES DISTRICT COURT			
12	NORTHERN DISTRICT OF CALIFORNIA			
13	SAN FRANCISCO DIVISION			
14	George J. Hannon,	Case No. 17-cv-07236-JST		
15	Plaintiff,	STIPULATION AND PROPOSED		
16	-against-	ORDER REGARDING EXTENSION OF TIME TO ANSWER OR OTHERWISE		
17	American Express Company, et al., RESPOND TO THECOMPLAINT			
18	Defendants,			
19	-and-			
20	Wells Fargo & Company,			
21	Nominal Defendant.			
22				
23				
24	Pursuant to Civil Local Rule 6-1, defendant American Express Company ("Defendant")			
25	and plaintiff George J. Hannon ("Plaintiff") hereby stipulate and agree with reference to			
26	the following:	the following:		
27	A. Plaintiff filed a complaint in this case against Defendant on December 20, 2017			
28	(the "Complaint"). STIPULATION AND-PROPOSED ORDER REGARDING EXTENSION OF TIME TO ANSWER OR			
	STIPULATION AND-FROPOSED ORDER REGARDING EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT 1 Case No. 17-cv-07236-JST			

1	B.	B. The Complaint was served on Defendant on December 28, 2017.		
2	C.	On January 16, 2018, Plaintiff and Defendant agreed to extend the time for		
3		Defendant to answer, move with respect to, or otherwise respond to the Complaint		
4		to February 20, 2018.		
5	D.	On January 23, 2018, the Court scheduled a Case Management Conference for		
6		March 28, 2018 at 2:00 p.m.		
7	E.	Plaintiff and Defendant have now agreed to further extend the deadline for		
8		Defendant to answer, move with respect to, or otherwise respond to the Complaint		
9		by an additional 30 days to March 22, 2018.		
10	F.	In addition, to the extent Defendant moves to dismiss the Complaint, Plaintiff and		
11		Defendant agree to set (i) April 12, 2018 as the deadline for Plaintiff to file an		
12		opposition to Defendant's motion to dismiss and (ii) May 3, 2018 as the deadline		
13		for Defendant to file a reply in further support of Defendant's motion to dismiss.		
14	Terms of Stipulation			
15	1.	The time for the Defendant to answer, move with respect to, or otherwise respond		
16		to the Complaint shall be extended through and including March 22, 2018.		
17	2.	2. To the extent Defendant moves to dismiss the Complaint, Plaintiff and Defendant		
18		shall comply with the following schedule: (i) April 12, 2018 as the deadline for		
19	Plaintiff to file an opposition to Defendant's motion to dismiss; and (ii) May 3,			
20		2018 as the deadline for Defendant to file a reply in further support of Defendant's		
21	motion to dismiss.			
22	IT IS SO STIPULATED.			
23	Dated: Febru	FARMER BROWNSTEIN JAEGER & GOLDSTEIN LLP		
24				
25		By: <u>/s/</u> David C. Brownstein		
26	David C. Brownstein Attorney for Defendant			
27		American Express Company		
28				
	STIPULATI	ON AND P ROPOSED ORDER REGARDING EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT		
		2 Case No. 17-cv-07236-JST		

1					
2	Dated: February 16, 2018	BOTTINI &	BOTTINI, INC.		
3			By: <u>/s/ Albert Y. Chang</u>		
4			Albert Y. Chang		
5			ottini, Jr. (SBN 175783)		
6		Albert Y. Chang (SBN 296065) Yury A. Kolesnikov (SBN 271173)			
		7817 Ivanhoe Avenue, Suite 102			
7		La Jolla, Cali			
8		Telephone: Facsimile:	(858) 914-2001 (858) 914-2002		
9		Email:	fbottini@bottinilaw.com		
9			achang@bottinilaw.com		
10			ykolesnikov@bottinilaw.com		
11		THE SHUM	AN LAW FIRM		
12		1	an (SBN 145842)		
		0	y Street, Suite 1800 o, California 94104		
13			(303) 861-3003		
14		Facsimile:	(303) 536-7849		
15		Email:	kip@shumanlawfirm.com		
16		Attorney for Plaintiff			
17	ATTESTATION PURSUANT TO GENERAL ORDER 45				
18	I, David C. Brownstein, in compliance with General Order 45, Section X(B), hereby				
19	attest that I obtained the concurrence of all of the above-listed counsel in filing this				
20	document.				
21			/s/ David C. Brownstein		
22	David C. Brownstein				
			Attorney for Defendant American Express Company		
23					
24	ORDER				
25	PURSUANT TO STIPULATION, IT IS SO ORDERED.				
26	Dated: February <u>22</u> , 2018		Juni. degen		
27			The Honorable Jon S. Tigar United States District Judge		
28					
	STIPULATION AND PROPOSE	ED ORDER REG	ARDING EXTENSION OF TIME TO ANSWER OR		
	OTHERWISE RESPOND TO THE COMPLAINT 3 Case No. 17-cv-07236-JST				