1	Janice P. Brown, Esq. (SBN 114433) brown@brownlawgroup.com Stacy L. Fode, Esq. (SBN 199883)			
2	fode(a) brownlaw group.com			
3	Arlene R. Yang, Ésq. (SBN 297450) yang@brownlawgroup.com			
4	600 B Street, Suite 1650			
5	San Diego, CA 92101 Telephone: 619.330.1700 Facsimile: 619.330.1701			
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7 8	Attorneys for Defendants Bank of America Corporation and Bank of America, N.A. and Intralinks, Inc.			
9	(additional counsel on signature page)			
10	UNITED STATES DISTRICT COURT			
11	NORTHERN DISTRIC	T OF CALIFORNIA		
12				
13	INFORMATECH CONSULTING, INC.,	Case No. 3:20-cv-02892-VC		
14	Individually and on behalf of All Others Similarly Situated,	[Assigned for all purposes to		
15	Plaintiffs,	Judge Vince Chhabria]		
16	v.	JOINT STIPULATION RE:		
17	BANK OF AMERICA CORPORATION; BANK OF	DEADLINE TO FILE FIRST AMENDED COMPLAINT,		
18	AMERICA, N.A.; and DOES 1-10, inclusive,	RESPONSIVE PLEADING, AND RESCHEDULING INITIAL CASE		
19	Defendants.	MANAGEMENT CONFERENCE		
20				
21	STUDIO 1220, INC., a California corporation, on behalf of itself and all	Case No.: 3:20:cv-03081-VC		
22	others similarly situated,			
23	Plaintiffs,			
24	V.			
25	BANK OF AMERICA, NATIONAL ASSOCIATION, a national association; and INTRALINKS, INC., a Delaware			
26 27	and INTRALINKS, INC., a Delaware corporation,			
28	Defendants.			
-	Informatech Consulting, Inc. v. Bank of America Corp., et a Related to: Studio 1220, Inc. v. Bank of America, N.A., et al JOINT STIPULATION RE: AMENDED COMPLAINT RESCHEDULING INITIAL CASE MANAGEMENT C	Case No. 3:20-cv-03081-VC , RESPONSIVE PLEADING, AND		

Through their attorneys of record, Plaintiff Informatech Consulting, Inc.
 ("Informatech") and Plaintiff Studio 1220, Inc. ("Studio 1220") (collectively
 referred to as "Plaintiffs") along with Defendants Bank of America Corporation and
 Bank of America, N.A. (collectively referred to as "BofA") and Defendant
 Intralinks, Inc. ("Intralinks") (BofA and Intralinks, collectively to as "Defendants"),
 hereby stipulate and agree as follows:

Plaintiff Informatech filed its Complaint in the *Informatech Consulting Inc. v. Bank of America Corporation,* Case No. 3:20-cv-02892-VC ("Informatech
 Action") on April 27, 2020. (Case No. 3:20-cv-02892-VC, Doc. No. 1.)

Plaintiff Studio 1220 its Complaint in the *Studio 1220, Inc. v. Bank of America, N.A.,* No. 3:20-cv-03081-VC ("Studio 1220 Action") on May 5, 2020.
 (Case No. 3:20-cv-03081-VC, Doc. No. 1.)

3. The responsive pleading to the Informatech Action Complaint is
currently due on September 4, 2020, after one stipulation to extend time, and an order
granting a consent motion to stay pending the JPML ruling. (Case No. 3:20-cv02892-VC, Doc. Nos. 14 and 22; Declaration of Arlene Yang ("Yang Decl.") ¶ 2.)

4. The responsive pleading to the Studio 1220, Inc. Action Complaint is
currently due on September 4, 2020, after one stipulation to extend time for each
Defendant, and an order granting a consent motion to stay pending the JPML ruling.
(Case No. 3:20-cv-03081-VC, Docs. Nos. 18, 22, 32; Yang Decl. ¶ 3.)

5. On August 19, 2020, Plaintiffs filed a Joint Administrative Motion to
Consider Whether Cases Should be Related, stating that they "intend to file a
consolidated amended complaint upon entry of an order relating the two actions."
(Case No. 3:20-cv-02892-VC, Doc No. 27, 4:13-4:14; Yang Decl. ¶ 4.)

6. On August 27, 2020 the Court found the cases related and entered a
Related Case Order, assigning both matters to Judge Vincent Chhabria. (Case No.
3:20-cv-02892-VC, Doc. No. 34.)

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7. A deadline for the parties to file a Joint ADR report in the Informatech
 Action is currently September 16, 3030, pursuant to court order. (Case No. 3:20-cv 02892, Doc. No. 31.)

8. The Initial Case Management Conference in the Informatech Action is
scheduled for September 22, 2020. (Case No. 3:20-cv-02892-VC, Doc. No. 36.)

9. The Court has not yet set a discovery cut-off date, pretrial conference
date, or trial date for either the Informatech Action or the Studio 1220 Action. (Yang
Decl. ¶ 5.)

9 10. Pursuant to L.R. 6-2(a), the parties may stipulate and request a Court
10 order for an enlargement of time that alters an event or deadline already fixed by
11 Court order or that involves papers required to be filed with the Court.

12 11. In light of Plaintiffs' intention to file a consolidated amended
13 complaint, the parties agree, in the interests of judicial efficiency and judicial
14 economy, that it is appropriate to extend Defendants' responsive pleading deadlines.
15 the date of the Initial Case Management Conference, and related deadlines. (Yang
16 Decl. ¶ 6.)

17 12. No party will be prejudiced by the requested time modifications or a
18 rescheduled Initial Case Management Conference. (Yang Decl. ¶ 7.)

19 13. The requested time modification will not affect the schedule for the
20 case. (Yang Decl. ¶ 8.)

21 14. Plaintiffs will file a consolidated amended complaint no later than
22 September 25, 2020.

15. Defendants shall file responsive pleadings, or otherwise respond, no
later than 30 days after the filing of the First Amended Complaint, or if no First
Amended Complaint is filed by September 25, 2020, by October 26, 2020.

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3 time and date that is convenient for the Court. 4 17. The Case Management Statement and the Joint ADR Report will be 5 filed no later than two weeks before the Initial Case Management Conference. 6 IT IS SO STIPULATED. 7 Bated: September 2, 2020 LOCKRIDGE GRINDAL NAUEN PLL.P. 10 By: /s/ Rebecca A. Peterson 11 Robert K. Shelquist 12 Robert K. Shelquist 13 Ion avice application pending) 14 Rebecca A. Peterson (SBN 241858) 15 Robert K. Shelquist 16 Fax (612) 339-0981 17 rkshelquist@locklaw.com 18 WHITFIELD BRYSON LLP 18 Alex R. Straus (SBN 321366) 19 Io? Alex R. Straus (SBN 321366) 16 Io alex@whitfieldbryson.com 17 Bale@@whitfieldbryson.com 18 Alex R. Straus (SBN 321366) 19 Io K. Bryson 20 Io Maco Forthcoming) 21 Bale@@whitfieldbryson.com 22 Inpo hae vice forthcoming) 23 Scott C. Harris 24 (pro hae					
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1			dan@whitfieldbryson.com
2			scott@whitfieldbryson.com
3			pat@whitfieldbryson.com
			BERGER MONTAGUE PC
4			Benjamin Galdston (SBN 211114)
5			12544 High Bluff Drive, Suite 340
6			San Diego, CA 92130 Tel. (619) 489-0300
7			bgaldston@bm.net
8			GREG COLEMAN LAW PC
9			Lisa A. White
10			(admitted pro hac vice)
11			William A. Ladnier (SBN 330334) 800 S. Gay Street, Suite 1100
			Knoxville, TN 37929
12			Tel. (865) 247-0080
13			Fax (865) 522-0049
14			Attorneys for Plaintiff
15			Informatech Consulting, Inc.
16			and the Proposed Class
17			
18	Dated: September 2, 2020		KEEGAN & BAKER, LLP
19		By:	/s/ Patrick N. Keegan
20		Dy.	Patrick N. Keegan, Esq. (SBN 167698)
21			2292 Faraday Avenue, Suite 100
22			Carlsbad, CA 92008 Tel: 760.929.9303
			Fax: 760.929.9260
23			pkeegan@keebanbaker.com
24			Attorneys for Plaintiff
25			Studio 1220, Inc.
26			and the Proposed Class
27			
28			
	Informatech Consulting, Inc. v. Bank of Ame Related to: Studio 1220, Inc. v. Bank of Ame		
	JOINT STIPULATION RE: AMENDED	COMP	LAINT, RESPONSIVE PLEADING, AND
	RESCHEDULING INITIAL CASE MAN	AGEM	ENT CONFERENCE Page 5 of 9

2	D	/r/ Aulan a D. V
3	By:	<u>/s/ Arlene R. Yang</u> Janice P. Brown (SBN 114433)
,		Stacy L. Fode (SBN 199883)
1		Arlene R. Yang (SBN 297450)
5		600 B Street, Suite 1650
		San Diego, CA 92101
5		Tel. 619-330-1700
7		Fax 619-330-1701
3		brown@brownlawgroup.com
		fode@brownlawgroup.com
)		yang@brownlawgroup.com
)		WILLIAMS & CONNOLLY LLP
L		Enu A. Mainigi
2		(pro hac vice)
		Kenneth C. Smurzynski
3		(pro hac vice)
1		Craig D. Singer
5		(pro hac vice)
,		Jesse T. Smallwood
5		(pro hac vice) 725 12th Street, N.W.
7		Washington, D.C. 20005
		Tel. 202-434-5000
3		Fax 202-434-5029
)		emainigi@wc.com
)		ksmurzynski@wc.com
		csinger@wc.com
		jsmallwood@wc.com
2		Attorneys for Defendants
3		Bank of America Corporation
1		and Bank of America, N.A.
5		
5		
7		
3		
	Informatech Consulting, Inc. v. Bank of America Co.	<i>rp., et al.</i> Case No. 3:20-cv-02892-

1	Dated: September 2, 2020 BR	OWN LAW GROUP
2	By: <u>/s/</u> A	rlene R. Yang
3	Jani	ce P. Brown (SBN 114433) y L. Fode (SBN 199883)
4	Arle	ne R. Yang (SBN 297450)
5	San	B Street, Suite 1650 Diego, CA 92101
6	Tel.	619-330-1700
7	hron	619-330-1701 vn@brownlawgroup.com
8	fode	@brownlawgroup.com
9		g@brownlawgroup.com
10	PAU	JL, WEISS, RIFKIND, WHARTON
11		D GARRISON LLP
12		ert A. Atkins hac vice)
13	Josh	ua D. Kaye
14		hac vice) mas C. Rice
15		hac vice)
16		5 Avenue of the Americas
17		York, NY 10019 212-373-3000
18	ratk	ns@paulweiss.com
19	jkay	e@paulweiss.com e@paulweiss.com
20		e@paulweiss.com
20	Atto	rneys for Defendant alinks, Inc.
22		
23		
24		
25		
26		
27		
28		
	Informatech Consulting, Inc. v. Bank of America Corp., et a Related to: Studio 1220, Inc. v. Bank of America, N.A., et al JOINT STIPULATION RE: AMENDED COMPLAINT RESCHEDULING INITIAL CASE MANAGEMENT C	Case No. 3:20-cv-03081-VC , RESPONSIVE PLEADING, AND

1	PURSUANT TO STIPULATION, IT IS SO ORDERED.
2	SLITES DISTRICT CO
3	Dated: September 10, 2020 By:
4	Hon. Tud
5	Uniteder Judge Vince Chhabria
6	AV DISTRICT OF
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	Informatech Consulting, Inc. v. Bank of America Corp., et al. Case No. 3:20-cv-02892-VC Related to: Studio 1220, Inc. v. Bank of America, N.A., et al. Case No. 3:20-cv-03081-VC
	JOINT STIPULATION RE: AMENDED COMPLAINT, RESPONSIVE PLEADING, AND RESCHEDULING INITIAL CASE MANAGEMENT CONFERENCEPage 8 of 9

1	ATTESTATION
2	I, Arlene R. Yang, attest that all other signatures listed, and on whose behalf
3	the filing is submitted, concur in the filing's contents and have authorized the filing.
4	
5	/s/ Arlene R. Yang
6	Arlene R. Yang
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20	Informatech Consulting, Inc. v. Bank of America Corp., et al. Case No. 3:20-cv-02892-VC
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	RESCHEDULING INITIAL CASE MANAGEMENT CONFERENCE Page 9 of 9