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Bank of America Corporation and
 8 *Bank of America, N.A. and Intralinks, Inc.*

9 (additional counsel on signature page)

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

13 INFORMATECH CONSULTING, INC.,
 Individually and on behalf of All Others
 14 Similarly Situated,

15 Plaintiffs,

16 v.

17 BANK OF AMERICA
 CORPORATION; BANK OF
 18 AMERICA, N.A.; and DOES 1-10,
 inclusive,

19 Defendants.
 20

Case No. 3:20-cv-02892-VC

*[Assigned for all purposes to
 Judge Vince Chhabria]*

**JOINT STIPULATION RE:
 DEADLINE TO FILE FIRST
 AMENDED COMPLAINT,
 RESPONSIVE PLEADING, AND
 RESCHEDULING INITIAL CASE
 MANAGEMENT CONFERENCE**

21 STUDIO 1220, INC., a California
 corporation, on behalf of itself and all
 22 others similarly situated,

23 Plaintiffs,

24 v.

25 BANK OF AMERICA, NATIONAL
 ASSOCIATION, a national association;
 26 and INTRALINKS, INC., a Delaware
 corporation,

27 Defendants.
 28

Case No.: 3:20:cv-03081-VC

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

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

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

13 3. The responsive pleading to the Informatech Action Complaint is
14 currently due on September 4, 2020, after one stipulation to extend time, and an order
15 granting a consent motion to stay pending the JPML ruling. (Case No. 3:20-cv-
16 02892-VC, Doc. Nos. 14 and 22; Declaration of Arlene Yang (“Yang Decl.”) ¶ 2.)

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

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

25 6. On August 27, 2020 the Court found the cases related and entered a
26 Related Case Order, assigning both matters to Judge Vincent Chhabria. (Case No.
27 3:20-cv-02892-VC, Doc. No. 34.)
28

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

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

6 9. The Court has not yet set a discovery cut-off date, pretrial conference
7 date, or trial date for either the Informatech Action or the Studio 1220 Action. (Yang
8 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.

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

1 16. The parties request that the Initial Case Management Conference be
2 scheduled for approximately two weeks after the responsive pleadings are due, at a
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
8 Dated: September 2, 2020

**LOCKRIDGE GRINDAL NAUEN
P.L.L.P.**

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Dated: September 2, 2020

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1 Dated: September 2, 2020

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1 Dated: September 2, 2020

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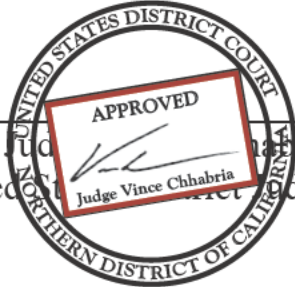
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 10, 2020

By:

Hon. Judge Vince Chhabria
United States District Court for the Northern District of California



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ATTESTATION

I, Arlene R. Yang, attest that all other signatures listed, and on whose behalf the filing is submitted, concur in the filing’s contents and have authorized the filing.

/s/ Arlene R. Yang
Arlene R. Yang