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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 DISTRICT OF CALIFORNIA			
12				
13	INFORMATECH CONSULTING, INC., Individually and on behalf of All Others	Case No. 3:20-cv-02892-VC		
14	Similarly Situated,	[Assigned for all purposes to Judge Vince Chhabria]		
15	Plaintiffs,	Judge Vince Chhabria]		
16	V.	JOINT STIPULATION RE: DEADLINE TO FILE FIRST		
17	BANK OF AMERICA CORPORATION; BANK OF	AMENDED COMPLAINT, RESPONSIVE PLEADING, AND		
18 19	AMERICA, N.A.; and DOES 1-10, inclusive,	RESCHEDULING INITIAL CASE MANAGEMENT CONFERENCE		
20	Defendants.			
21	STUDIO 1220, INC., a California	Case No.: 3:20:cv-03081-VC		
22	corporation, on behalf of itself and all others similarly situated,			
23	Plaintiffs,			
24	V.			
25	BANK OF AMERICA, NATIONAL			
26	BANK OF AMERICA, NATIONAL ASSOCIATION, a national association; and INTRALINKS, INC., a Delaware corporation,			
27	Defendants.			
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		

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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Related to: Studio 1220, Inc. v. Bank of America, N.A., et al. Case No. 3:20-cv-03081-V JOINT STIPULATION RE: AMENDED COMPLAINT, RESPONSIVE PLEADING, AND					
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 PLLLP. 10 By: /s/ Rebecca A. Peterson Robert K. Shelquist (pro havice application pending) Rebecca A. Peterson (SBN 241858) 11 Color (51) 339-6900 12 Rebecca A. Peterson (SBN 241858) 13 100 Washington Avenue South, Ste 2200 Minneapolis, MN 55401 14 Tcl. (612) 339-6900 15 Fax (612) 339-6901 16 Fax (612) 339-6901 17 Rakelquist@locklaw.com 18 WHITFIELD BRYSON LLP 18 Alex R. Straus (SBN 321366) 19 Alex R. Straus (SBN 321366) 19 16/748 McCormick Street 20 Daniel K. Bryson 21 alex@whitfieldbryson.com 22 (pro hav vice fortheoming) 23 Scott C. Harris 24 (pro hav vice fortheoming) 25 (pro hav vice fortheoming)	1	16. The parties request	that tl	he Initial Case Manager	ment Conference be
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 Dated: September 2, 2020 LOCKRIDGE GRINDAL NAUEN P.L.LP. 10 By: <u>/s/Rebecca A. Peterson</u> Robert K. Shelquist (pro hac vice application pending) Rebecca A. Peterson (SBN 241858) 13 100 Washington Avenue South, Ste 2200 Minneapolis, MN 55401 Tel. (612) 339-6900 14 Tel. (612) 339-6901 Fax (612) 339-6901 15 Fax (612) 339-6901 Fax (612) 339-6901 16 rapeterson@locklaw.com 17 Numerapolis, MN 55401 18 Alex R. Straus (SBN 321366) 19 Alex R. Straus (SBN 321366) 16 Tel. (310) 459-9689 20 Los Angeles, CA 91436 Tel. (310) 459-9689 21 alex@whitfieldbryson.com 22 Daniel K. Bryson (pro hac vice forthcoming) 23 Scott C. Harris 24 (pro hac vice forthcoming) 25 (pro hac vice forthcoming) 26 Patrick M. Wallace 27 Tel. (919) 600-5005 28 Informatech Consulting. Inc. v. Bank of America Corp et	2	scheduled for approximately two	weel	ks after the responsive	pleadings are due, at a
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28 <i>Informatech Consulting, Inc. v. Bank of America Corp., et al.</i> <i>Related to: Studio 1220, Inc. v. Bank of America, N.A., et al.</i> JOINT STIPULATION RE: AMENDED COMPLAINT, RESPONSIVE PLEADING, AND				Raleigh, NC 27605	
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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
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	JOINT STIPULATION RE: AMENDED	COMP	LAINT, RESPONSIVE PLEADING, AND
	RESCHEDULING INITIAL CASE MAN	AGEM	ENT CONFERENCE Page 5 of 9

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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