

1 JAY SMITH (California Bar No. 166105)  
 (Email: js@gslaw.org)  
 2 ADRIAN BARNES (California Bar No. 253131)  
 (Email: abarnes@gslaw.org)  
 3 LINDA S. FANG (California Bar No. 240245)  
 (Email: lfang@gslaw.org)  
 4 **GILBERT & SACKMAN, A Law Corporation**  
 3699 Wilshire Boulevard, Suite 1200  
 5 Los Angeles, California 90010  
 Tel: (323) 938-3000, Fax: (323) 937-9139

6 STEVEN A. MARTINO (*pro hac vice*)  
 (Email: stevemartino@taylormartino.com)  
 7 W. LLOYD COPELAND (*pro hac vice*)  
 (Email: lloyd@taylormartino.com)  
 8 KASIE M. BRASWELL (*pro hac vice*)  
 (Email: kasie@taylormartino.com)  
 9 **TAYLOR MARTINO ZARZAUR, P.C.**  
 10 51 St. Joseph Street  
 Mobile, Alabama 36602  
 11 Tel: (251) 433-3131, Fax: (251) 405-5080

12 GREGORY HAWLEY (*pro hac vice*)  
 (Email: ghawley@waadlaw.com)  
 13 U. W. CLEMON (*pro hac vice*)  
 (Email: uwclemon@waadlaw.com)  
 14 CHRISTOPHER J. NICHOLSON (*pro hac vice*)  
 (Email: cnicholson@waadlaw.com)  
 15 REBECCA G. DEPALMA (*pro hac vice*)  
 (Email: rdepalma@whitearnolddowd.com)  
 16 **WHITE ARNOLD & DOWD, P.C.**  
 2025 Third Avenue North, Suite 500  
 17 Birmingham, Alabama 35203  
 Tel: (205) 323-1888, Fax: (205) 323-8907

18 Attorneys for Plaintiffs Wanda Greenwood,  
 19 Ladelle Hatfield, and Deborah McCleese

20 **IN THE UNITED STATES DISTRICT COURT**

21 **FOR THE NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

22 WANDA GREENWOOD, LADELLE HATFIELD,  
 and DEBORAH MCCLEESE, on behalf of  
 23 themselves and all others similarly situated,

24 Plaintiffs,

25 v.

26 COMPUCREDIT CORPORATION; COLUMBUS  
 BANK AND TRUST, jointly and individually,

27 Defendants.

Case No. 4:08-cv-4878 CW (EDL)

Hon. Elizabeth D. Laporte for Discovery Matters

**STIPULATION SHORTENING TIME FOR  
 DEFENDANT COMPUCREDIT  
 CORPORATION’S MOTION FOR  
 PROTECTIVE ORDER AND PLAINTIFFS’  
 MOTION TO COMPEL FURTHER  
 RESPONSES FROM COMPUCREDIT TO  
 THIRD SET OF REQUESTS FOR  
 PRODUCTION; [PROPOSED] ORDER**

1 Pursuant to Civil L.R. 6-2, Plaintiffs and Defendant CompuCredit Corporation (“CompuCredit”)  
2 (collectively, “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

3 WHEREAS, Plaintiffs filed a motion to compel further responses from CompuCredit to their  
4 second set of requests for production of documents on May 11, 2010, and scheduled the hearing on this  
5 motion for June 15, 2010, at 9:00 a.m., in accordance with Civil L.R. 7-2;

6 WHEREAS, the Parties stipulated to allow Plaintiffs to take an additional 30(b)(6) deposition of  
7 CompuCredit and scheduled this deposition for May 21, 2010;

8 WHEREAS, counsel for the Parties have met and conferred about the scope and topics for this  
9 deposition and cannot agree on seven of the 23 topics set forth in the notice of deposition;

10 WHEREAS, CompuCredit filed a motion for protective order on May 13, 2010;

11 WHEREAS, the parties desire to resolve this issue prior to the deposition of CompuCredit;

12 WHEREAS, the parties have agreed to continue the deposition to the week of June 21, 2010;

13 WHEREAS, the parties have met and conferred regarding CompuCredit’s responses to Plaintiffs’  
14 third set of requests for production of documents and cannot agree on certain requests and/or objections;

15 WHEREAS, Plaintiffs plan to file a motion to compel further responses from CompuCredit to  
16 their third set of requests for production of documents;

17 WHEREAS, the parties agree that it is in the interest of judicial economy and the preservation of  
18 the parties’ resources for these matters to be heard by the Court as soon as possible and at the same time;

19 WHEREAS, since the inception of the case in October 2008, the parties have either stipulated or  
20 moved the Court for time modifications on approximately ten occasions; and

21 WHEREAS, the time modification requested herein will not adversely affect the schedule for the  
22 case, or shorten the Court’s time to review the papers filed in connection with these motions, and will  
23 instead allow the parties to move forward in an expeditious manner.

24 NOW, THEREFORE, the parties agree and stipulate that:

25 1. CompuCredit’s motion for protective order shall be briefed and heard on shortened time,  
26 on June 15, 2010, at the same time as Plaintiffs’ motion to compel further responses to their second set  
27 of requests for production of documents. Any opposition to CompuCredit’s motion shall be filed no  
28 later than May 27, 2010, and any reply shall be filed no later than June 1, 2010.

