

1 CARRIE A. GONELL, State Bar No. 257163
 2 MORGAN, LEWIS & BOCKIUS LLP
 3 5 Park Plaza, Suite 1750
 4 Irvine, CA 92614
 5 Tel: 949.399.7000
 6 Fax: 949.399.7001
 7 Email: cgonell@morganlewis.com

8 LAUREN S. KIM, State Bar No. 210572
 9 MORGAN, LEWIS & BOCKIUS LLP
 10 2 Palo Alto Square
 11 3000 El Camino Real, Suite 700
 12 Palo Alto, CA 94306-2122
 13 Tel: 650.843.4000
 14 Fax: 650.843.4001
 15 Email: lkim@morganlewis.com

16 Attorney for Defendants
 17 JPMORGAN CHASE & CO., JPMORGAN CHASE BANK,
 18 N.A., and CHASE BANK USA, N.A.

19 PETER M. HART, State Bar No. 198691
 20 **LAW OFFICES OF PETER M. HART**
 21 One Wilshire Blvd, Suite 2200
 22 Los Angeles, California 90017
 23 Tel: 310.478-5789
 24 Fax: 509.561.6441
 25 Email: hartpeter@msn.com

26 * Additional Plaintiff's Counsel Listed
 27 On Following Page

28 Attorneys for Plaintiff NICOLE VILLEGAS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NICOLE VILLEGAS, as an individual and on
 behalf of all others similarly situated,

Plaintiff,

vs.

J.P. MORGAN CHASE & CO., a Delaware
 corporation; J.P. MORGAN CHASE BANK,
 N.A., a national association; CHASE BANK
 USA, N.A., a national association; and DOES
 1 through 50, inclusive,

Defendants.

Case No. CV 09-00261 SBA

CLASS ACTION

**JOINT NOTICE OF SETTLEMENT AND
 STIPULATION TO SET STATUS
 CONFERENCE AND TO VACATE
 DATES**

Judge: Hon. Sandra Brown Armstrong
 Room: 1, Fourth Floor
 Complaint Filed: December 18, 2008

JOINT NOTICE OF SETTLEMENT AND
 STIPULATION TO SET STATUS
 CONFERENCE AND TO VACATE DATES
 CASE NO. CV 09-00261 SBA

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ADDITIONAL PLAINTIFF'S COUNSEL

ERIC HONIG (State Bar No. 140765)
LAW OFFICE OF ERIC HONIG
P.O. Box 10327
Marina del Rey, California 90295
Telephone: (310) 314-2603
Facsimile: (310) 314-2793
erichonig@aol.com

KENNETH H. YOON State Bar No. 198443
LAW OFFICES OF KENNETH H. YOON
One Wilshire Blvd., Suite 2200
Los Angeles, CA 90017
(213) 612-0988
(213) 947-1211 facsimile
kyoon@yoon-law.com

LARRY W. LEE State Bar No. 228175
DIVERSITY LAW GROUP, A Professional Corporation
444 S. Flower Street
Citigroup Center • Suite 1370
Los Angeles, California 90071
(213) 488-6555
(213) 488-6554 facsimile
lwlee@diversitylaw.com

Attorneys for Plaintiff
NICOLE VILLEGAS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Plaintiff Nicole Villegas (“Plaintiff”) and Defendants JPMorgan Chase Bank, N.A., JPMorgan Chase & Co., Chase Bank USA, N.A. (collectively, “Defendants”), by and through their respective counsel of record named herein, hereby provide notice of the class-wide settlement reached in this case and stipulate as follows:

WHEREAS, Plaintiff and Defendants have reached a class-wide settlement of this matter;

WHEREAS, Plaintiff and Defendants through their respective counsel of record have executed a Memorandum of Understanding as to the class-wide settlement terms;

WHEREAS, Plaintiff and Defendants will be submitting a formal class settlement agreement to this Court for preliminary approval;

WHEREAS, Plaintiff has previously filed her Motion for Class Certification, currently set to be heard by this Court on June 28, 2011 at 1:00 p.m.;

THEREFORE, in light of the Memorandum of Understanding reached in this case, Plaintiff and Defendants, through their undersigned respective counsel, stipulate and request that the Court hereby order as follows:

1. That Plaintiff’s Motion for Class Certification, currently set for hearing on June 28, 2011 at 1:00 p.m. be vacated, as well as all other hearing dates, cut-off dates, and trial dates; and
2. In its place, a Status Conference be set for June 28, 2011 at 1:00 p.m., or on June 30, 2011, or on another available date in order to allow Plaintiff, Defendants, and this Court to discuss a schedule for Plaintiff’s anticipated Motion for Preliminary Approval of the Class Action Settlement.

IT IS SO STIPULATED.

1
2 Dated: June 3, 2011

Respectfully Submitted,

3 MORGAN, LEWIS & BOCKIUS LLP

4
5 By /s/

6 Carrie A. Gonell
7 Attorneys for Defendants
8 JPMORGAN CHASE & CO., JPMORGAN
9 CHASE BANK, N.A., AND CHASE
10 BANK USA, N.A.

11 Dated: June 3, 2011

Respectfully Submitted,

12 LAW OFFICES OF PETER M. HART

13 By /s/

14 Peter M. Hart
15 Attorneys for Plaintiff
16 NICOLE VILLEGAS

17 **ORDER**

18 The parties having so stipulated, and GOOD CAUSE APPEARING THEREFORE, IT IS
19 HEREBY ORDERED that:


- 20 1. Plaintiff's Motion for Class Certification, currently set for hearing on June 28,
21 2011 at 1:00 p.m. is hereby vacated, as well as all other hearing dates, cut-off
22 dates, and trial dates; and
- 23 2. A Status Conference is hereby set for the next available date of July 14, 2011 at
24 3:00 p.m. in order for Plaintiff, Defendants, and this Court to discuss a schedule
25 for Plaintiff's anticipated Motion for Preliminary Approval of the Class Action
26 Settlement. Prior to the date scheduled for the conference, the parties shall meet
27 and confer and prepare a joint Case Management Conference Statement. The joint
28 statement shall be filed no later than ten (10) days prior to the conference and shall
comply with the Standing Order for All Judges of the Northern District of

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

California and the Standing Order of this Court. Plaintiff shall be responsible for filing the statement as well as for arranging the conference call. All parties shall be on the line and shall call (510) 637-3559 at the above indicated date and time.

IT IS SO ORDERED.

Date: 6/13/11


The Honorable Sandra B. Armstrong
United States District Judge