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18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA

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

21 Plaintiff,

22 vs.

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

26 Defendants.

Case No. CV 09-00261 SBA

CLASS ACTION

**JOINT STIPULATION AND PROPOSED  
 ORDER CONTINUING FEBRUARY 17,  
 2010 CROSS-BRIEFING DEADLINE AND  
 FEBRUARY 24, 2010 HEARING  
 DEADLINE ; ORDER**

Date: February 24, 2010

Time: 10:30 a.m.

Courtroom: C, 15th Floor

Judge: Mag. Judge Edward M. Chen

Complaint Filed: December 18, 2008

Trail Date: None Set

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Attorneys for Plaintiff  
NICOLE VILLEGAS

1 Plaintiff Nicole Villegas (“Plaintiff”) and Defendants JPMorgan Chase Bank, N.A.,  
2 JPMorgan Chase & Co., Chase Bank USA, N.A. (collectively, “Defendants”), by and through  
3 their respective counsel of record named herein, hereby stipulate as follows:

4 WHEREAS, in this Court’s January 28, 2010 Order Granting In Part and Denying In Part  
5 Plaintiff’s Motion to Compel and Denying Plaintiff’s Motion For Evidentiary and Preclusive  
6 Sanctions (Docket No. 78 - attached as Exhibit A), this Court ordered:

- 7 (1) Defendants to produce certain types of documents by February 8, 2010;
- 8 (2) Both parties to file cross-briefs by February 17, 2010; and
- 9 (3) Scheduled a hearing on the cross-briefs on February 24, 2010;

10 WHEREAS, Defendants produced over 3,850 pages of documents in response to this  
11 Court’s January 28, 2010 Order on February 8, 2010;

12 WHEREAS, Defendants informed Plaintiff that due to the unanticipated sheer volume of  
13 ordered documents (thousands of additional pages of documents) and the time required to process  
14 them for production, Defendants were only able to produce a portion of the documents to Plaintiff  
15 by February 8, 2010;

16 WHEREAS, Defendants have indicated to Plaintiff that they will be able to produce the  
17 remainder of the ordered documents on a rolling basis to be completed by February 22, 2010;

18 THEREFORE, the Parties, through their undersigned respective counsel, stipulate and  
19 request that the Court hereby order that, good cause appearing, the current briefing and hearing on  
20 Plaintiff’s Motion for an Order Compelling Further Responses to Plaintiff’s Requests for  
21 Production of Documents, Etc. (Docket No. 78) be continued as follows:

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Event	Old Deadlines	New Deadline
Defendants' Document Production	2/8/2010	<del>2/22/2010</del> 2/15/10
Cross-Briefs	2/17/2010	<del>3/10/2010</del> 2/24/10
Hearing on Cross-Briefs	2/24/2010 at 10:30 am	<del>3/3/10 at 3:00 p.m.</del> <del>3/17/2010 at 10:30 am</del>

8 Dated: February 12, 2010

Respectfully Submitted,

MORGAN, LEWIS & BOCKIUS LLP

11 By         /s/ Carrie A. Gonell        

Carrie A. Gonell

Attorneys for Defendants

JPMORGAN CHASE & CO., JPMORGAN

CHASE BANK, N.A., AND CHASE

BANK USA, N.A.

15 Dated: February 12, 2010

Respectfully Submitted,

LAW OFFICES OF PETER M. HART

18 By         /s/ Peter M. Hart        

Peter M. Hart

Attorneys for Plaintiff

NICOLE VILLEGAS

22 **ORDER**

The parties having so stipulated, and GOOD CAUSE APPEARING THEREFORE,

24 IT IS SO ORDERED. (as modified above)

26 Date:         February 12, 2010        

