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 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 STIPULATION AND ORDER  
 CONTINUING PRE-TRIAL AND TRIAL  
 DATE AND ANY ASSOCIATED DATES  
 FOR FILING OF CLASS  
 CERTIFICATION MOTION**

Judge: Hon. Sandra Brown Armstrong  
 Room: 3, Third Floor  
 Complaint Filed: December 18, 2008

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**ADDITIONAL PLAINTIFF'S COUNSEL**

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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, after the April 29, 2009 Case Management Conference, this Court set a  
5 number of case deadlines in this matter;

6 WHEREAS, the Parties have sought to continue the mediation in this matter due to  
7 conflicts with the past court-appointed mediators so that the Parties may have sufficient time to  
8 coordinate with a new court-appointed mediator;

9 WHEREAS, on July 17, 2009 Plaintiff filed a motion to compel further responses to  
10 Interrogatories served on Defendants and to compel further responses and the production of  
11 further documents by Defendants;

12 WHEREAS, the above discovery disputes were heard by Magistrate Judge Chen on  
13 September 2, 2009 and on October 7, 2009, with continued briefing ordered;

14 WHEREAS, on December 2, 2009, Plaintiff filed further briefing papers on the above  
15 discovery issues as ordered by Magistrate Judge Chen and the Court held a further hearing on  
16 these discovery issues on January 27, 2010;

17 WHEREAS, after the January 27, 2010 hearing, Magistrate Judge Chen issued certain  
18 limited discovery orders, ordered additional briefing from both parties, and also set a further  
19 hearing date for March 3, 2010;

20 WHEREAS, due to the extended briefing of the discovery disputes and due to the recently  
21 discovered conflict with the court-appointed mediator the Parties seek to continue for a period of  
22 approximately six months the dates currently set by the Court, including the Pre-Trial date and  
23 the attending Trial Date, and any attending deadline to file a motion for class certification;

24 WHEREAS, the Parties believe that such a continuance is needed to allow discovery to  
25 take place in a timely fashion and, after such discovery has taken place, to allow the Parties to  
26 properly mediate this case in an informed manner in the hopes of resolving this matter without a  
27 need for trial on these claims;

28 THEREFORE, the Parties, through their undersigned respective counsel, stipulate and

1 request that the Court hereby order that, good cause appearing, the current dates in the Case  
2 Management Order be continued as follows:

Event	Old Deadlines	New Deadline
General Discovery Cut-off	7/6/2010	1/7/2011
Expert Discovery Cut-off	8/6/2010	2/9/2011
Plaintiff to Name Experts by	7/6/2010	1/7/2011
Defendant to Name Experts by	7/6/2010	1/7/2011
All Dispositive Motion to be heard by (Motion Cut-off)	8/10/2010	2/15/2011
Pretrial Conference at 1:00 p.m.	9/21/2010	4/5/2011
Pretrial Papers Due	8/31/2010	3/8/2011
Motions in limine/objections to evidence due	9/7/2010	3/15/2011
Responses to motions in limine and/or responses to objections to evidence due	9/14/2010	3/22/2011
Reply to responses to motions in limine	<b>3/29/2011</b>	
Trial (Court/Jury: 15-20 days) at 8:30 a.m.	10/4/2010	4/11/2011

18 Dated: March 3, 2010

Respectfully Submitted,

MORGAN, LEWIS & BOCKIUS LLP

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.

