

1 Yosef Peretz (SBN 209288)
 Emily A. Knoles (SBN 241671)
 2 Michael D. Burstein (SBN 248516)
 3 PERETZ & ASSOCIATES
 22 Battery Street, Suite 202
 4 San Francisco, CA 94111
 Telephone: 415.732.3777
 5 Facsimile: 415.372.3791

6 Attorneys for Plaintiffs
 7 YESENIA GUITRON and JUDI KLOSEK

8 Baldwin J. Lee (Bar No. 187413)
 Alexander Nestor (Bar No. 202795)
 9 Amy Morgenstern (Bar No. 267412)
 10 ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP
 11 Three Embarcadero Center, 12th Floor
 San Francisco, CA 94111-4074
 12 Phone: (415) 837-1515
 13 Fax: (415) 837-1516
 E-Mail:blee@allenmatkins.com
 14 anestor@allenmatkins.com
 15 amorgenstern@allenmatkins.com

16 Attorneys for Defendants
 17 WELLS FARGO BANK, N.A., WELLS FARGO & CO. AND
 PAM RUBIO

18
 19 **UNITED STATES DISTRICT COURT**
 20 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

21 YESENIA GUITRON; and JUDI KLOSEK,

22 Plaintiffs,

23 v.

24 WELLS FARGO BANK, N.A.; WELLS
 25 FARGO & CO.; PAM RUBIO; and DOES 1-
 26 20,

Defendants.

CASE NO. CIV-10-03461 CW (MEJ)

**PARTIES' STIPULATION AND
 [PROPOSED] ORDER TO EXTEND
 PRE-TRIAL EXCHANGE DEADLINE**

1 Plaintiffs YESENIA GUITRON and JUDI KLOSEK and Defendants WELLS FARGO
2 BANK, N.A., WELLS FARGO & CO. and PAM RUBIO stipulate as follows:

3 WHEREAS, the pre-trial exchange and related pre-trial deadlines set by the Court's
4 Order for Pretrial Preparation commence on January 3, 2012 (Dkt. No. 18);

5 WHEREAS the parties will not have completed expert discovery by January 3, 2012;

6 WHEREAS Defendants' Motion to Sever and Motion for Summary Judgment, or in the
7 Alternative Partial Summary Judgment, currently are pending before the Court, and the hearing
8 date has been continued to January 5, 2012, which is after the current deadline for pre-trial
9 exchange;

10 WHEREAS the next case management conference was continued from December 15,
11 2011 to January 5, 2012, together with the hearing date for Defendants' motions;

12 WHEREAS the parties believe they cannot complete the pre-trial exchange and related
13 pre-trial requirements given the issues set forth above;

14 THEREFORE, the parties stipulate and respectfully ask the Court to extend the pre-trial
15 exchange currently due on January 3, 2012, pursuant to the Order for Pre-Trial Preparation
16 Order (Dkt. No. 18) to January 27, 2012.

17 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD:

18
19
20 Dated: December 15, 2011

PERETZ & ASSOCIATES

21
22 By: (-) Yosef Peretz
YOSEF PERETZ
23 Attorneys for Plaintiffs

24
25 Dated: December 15, 2011

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

26
27 By: (-) Alexander Nestor
ALEXANDER NESTOR
28 Attorneys for Defendants

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

[PROPOSED] ORDER

Pursuant to the parties' Stipulation, and Good Cause appearing therefor, the Court hereby orders that the pre-trial exchange currently due on January 3, 2012, pursuant to the Order for Pre-Trial Preparation Order (Dkt. No. 18) is continued to January 27, 2012, and the other pre-trial deadlines set forth in the Order for Pre-Trial Preparation Order are continued accordingly.

IT IS SO ORDERED.

Dated: December 16, 2011

By: 
HON. CLAUDIA WILKEN
U.S. DISTRICT JUDGE