

1 Daniel J. McLoon (State Bar No. 109598)  
2 Michael G. Morgan (State Bar No. 170611)  
3 JONES DAY  
4 555 South Flower Street, Fiftieth Floor  
5 Los Angeles, CA 90071-2300  
6 Telephone: (213) 489-3939  
7 Facsimile: (213) 243-2539  
8 Email: djmcloon@JonesDay.com  
9 mgmorgan@JonesDay.com

10 Attorneys for Defendant  
11 EXPERIAN INFORMATION SOLUTIONS, INC.

12 UNITED STATES DISTRICT COURT  
13  
14 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

15 ROANE HOLMAN, and all others similarly  
16 situated,

17 Plaintiffs,

18 v.

19 EXPERIAN INFORMATION SOLUTIONS,  
20 INC.; FINEX GROUP LLC,

21 Defendants.

Case No. CV-11-00180-CW (DMR)

Assigned to Magistrate Judge Donna M.  
Ryu for Discovery

**JOINT REQUEST FOR ORDER  
EXTENDING EXPERIAN'S  
DEADLINE TO RESPOND TO  
DISCOVERY**

**AND**

**[~~PROPOSED~~] ORDER**

JOINT REQUEST FOR ORDER EXTENDING  
EXPERIAN'S DEADLINE TO RESPOND TO  
DISCOVERY

1 Defendant Experian Information Solutions, Inc. (“Experian”) and Plaintiffs Roane  
2 Holman, Narcisco Navarro Hernandez, and Miguel A. Alvarez (“Plaintiffs” and, together with  
3 Experian, the “Parties”) submit this Joint Request for Order Extending Experian’s Deadline to  
4 Respond to Discovery.

5 WHEREAS, on June 14, 2012, Magistrate Judge Donna M. Ryu held a hearing on  
6 Plaintiffs’ motion to compel responses to Plaintiffs’ second set of requests for admissions and  
7 fourth set of interrogatories directed to Experian and, as confirmed in her written order dated June  
8 27, 2012, “the parties were ordered to complete the subject discovery within 90 days of the  
9 hearing”—i.e., by September 12, 2012—“and were instructed to meet and confer if any further  
10 extension of time became necessary.” *See* Docket 154, 160.

11 WHEREAS, Plaintiffs’ second set of requests for admissions and fourth set of  
12 interrogatories seek discovery related to whether each of 36,387 putative class members asked to  
13 have their vehicles towed or had their towing charges judicially established.

14 WHEREAS, the parties have not completed their discovery of Finex’s documents and  
15 their review of that information.

16 WHEREAS, the Parties agree that it would be premature for Experian to attempt to  
17 respond to Plaintiffs’ second set of requests for admissions and fourth set of interrogatories and  
18 that Experian will need at least two more months to respond to that discovery.

19 NOW, THEREFORE, the Parties request the Court to extend Experian’s deadline to  
20 respond to that discovery for sixty days, up to and including November 13, 2012. The Parties  
21 will continue to meet and confer regarding additional extensions.

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

Dated: August 16, 2012

JONES DAY

By: /s/ Michael G. Morgan

Michael G. Morgan

Attorneys for Defendant  
EXPERIAN INFORMATION SOLUTIONS,  
INC.

Dated: August 16, 2012

ANDERSON OGILVIE & BREWER LLP

By: /s/ Andrew J. Ogilvie

Andrew J. Ogilvie

Attorneys for Plaintiff  
ROANE HOLMAN, NARCISCO  
NAVARRO HERNANDEZ, MIGUEL A.  
ALVAREZ and all others similarly situated

**PROPOSED ORDER**

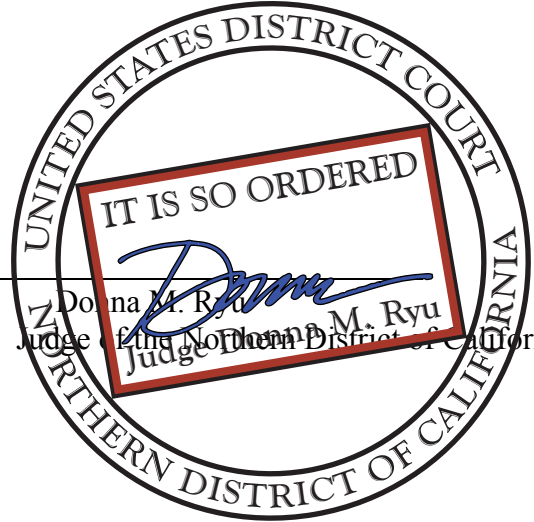
Pursuant to the Parties' request and good cause appearing, the Court orders as follows:

1. Experian's deadline to respond to the Plaintiffs' fourth set of interrogatories and second set of requests for admissions is hereby extended for sixty days, up to and including November 13, 2012.
2. The Parties are directed to meet and confer regarding additional extensions of the deadline.

IT IS SO ORDERED.

Dated: August 17, 2012

Donna M. Ryu  
Magistrate Judge of the Northern District of California



LAI-3174141v1