

REED SMITH LLP

A limited liability partnership formed in the State of Delaware

1 Jack R. Nelson (SBN 111863)  
 Email: jnelson@reedsmith.com  
 2 Karen A. Braje (SBN 193900)  
 Email: kbraje@reedsmith.com  
 3 David J. De Jesus (SBN 197914)  
 Email: ddejesus@reedsmith.com  
 4 Alicia A. Adornato (SBN 254228)  
 Email: aadornato@reedsmith.com  
 5 REED SMITH LLP  
 101 Second Street, Suite 1800  
 6 San Francisco, CA 94105-3659  
 Telephone: +1 415 543 8700  
 7 Facsimile: +1 415 391 8269

8 Attorneys for Defendants  
 Wachovia Bank, N.A., Wells Fargo & Company  
 9 and Wells Fargo Bank, N.A

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 CELESTE CARDUCCI,

13 Plaintiff,

14 vs.

15 WACHOVIA BANK, N.A., WELLS FARGO  
 BANK, N.A., WELLS FARGO BANK &  
 16 COMPANY,

17 Defendant.

Case No. 4:11-cv-00181-PJH

**NOTICE OF SETTLEMENT; [PROPOSED]  
 ORDER VACATING DECEMBER 8, 2011  
 CASE MANAGEMENT CONFERENCE  
 AND SETTING HEARING ON MOTION  
 FOR PRELIMINARY APPROVAL**

Honorable Phyllis J. Hamilton

19 Pursuant to Civil Local Rules 6-1(b) and 6-2, Plaintiff Celeste Carducci, by and through her  
 20 attorneys of record, and Defendants Wachovia Bank, N.A., Wells Fargo & Company and Wells  
 21 Fargo Bank, N.A, by and through their attorneys of record, (collectively, "the Parties"), hereby  
 22 notify the Court that they have reached a tentative settlement and request the Court vacate the  
 23 currently scheduled December 8, 2011 Case Management Conference. The Parties request that the  
 24 Court schedule a hearing on a Motion for Preliminary Approval of Class Action Settlement on  
 25 January 11, 2012, or a date that is convenient for the Court.

27 On its own motion, the Court previously continued the hearing on Defendants' Motion to  
 28 Dismiss to April 27, 2011. The Parties had a scheduling conflict on that date, however, and

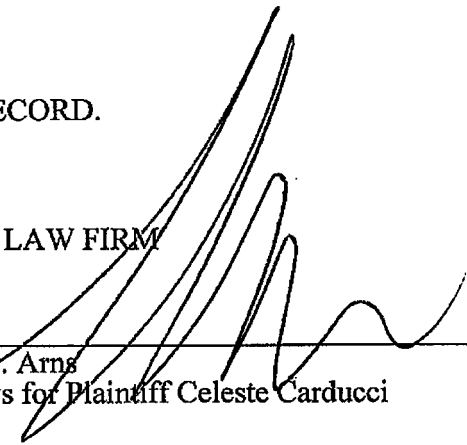
1 stipulated to continue the hearing date due to July 6, 2011. At the Parties' request due to settlement  
2 discussions, the Court continued the Motion to Dismiss hearing date and initial Case Management  
3 Conference several times. On September 13, 2011, the Court terminated Defendants' Motion to  
4 Dismiss and vacated the September 21, 2011 hearing date for the Motion to Dismiss allowing  
5 Defendants to renotice the Motion at a later date should settlement discussions fail. In that same  
6 Order, the Court also vacated the October 6, 2011 initial Case Management Conference and set a  
7 Case Management Conference for December 8, 2011.

8  
9 IT IS HEREBY STIPULATED that the Parties have reached a tentative settlement, and  
10 request the Court vacate the December 8, 2011 Case Management Conference and set the hearing on  
11 the Motion for Preliminary Approval of Class Action Settlement for January <sup>18</sup> ~~11~~, 2012 or any date  
12 that is convenient for the Court.

13  
14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.


15  
16 DATED: November 28, 2011.

THE ARNS LAW FIRM

17  
18 By   
19 Robert S. Arns  
20 Attorneys for Plaintiff Celeste Carducci

21 DATED: November 28, 2011.

REED SMITH LLP

22 By  FOR  
23 Jack R. Nelson  
24 Attorneys for Defendants Wachovia Bank, N.A.,  
Wells Fargo Bank, N.A., Wells Fargo & Company

25 IT IS SO ORDERED:

26  
27 DATED: December 2, 2011.

28 Honorable  lton

