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12 [ADDITIONAL COUNSEL LISTED IN SIGNATURE
 13 BLOCKS]

14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **OAKLAND DIVISION**

17 LESLIE EDWARD WALKER; ELAHE S.
 18 WALKER,

19 Plaintiffs,

20 v.

21 DITECH FINANCIAL, LLC; RESIDENTIAL
 22 CREDIT SOLUTIONS, INC.; and DOES 1-10,

23 Defendants.

Case No. 4:16-CV-03084-KAW

**STIPULATION TO EXTEND DEADLINE
 RE INITIAL DISCLOSURES, AND
 [PROPOSED] ORDER**

Judge: Hon. Kandis A. Westmore

Current Initial
 Disclosures Date: November 7, 2016

New Initial
 Disclosures Date: January 6, 2017

1 Plaintiffs Leslie Edward Walker and Elahe S. Walker (“Plaintiffs”), Defendant Ditech
2 Financial, LLC (“Ditech”) and Defendant Residential Credit Solutions, Inc. (“RCS”), (collectively
3 “Defendants”) (collectively with Plaintiffs, “Parties”), by and through their counsel, hereby
4 stipulate as follows:

5 WHEREAS, on June 6, 2016, Plaintiff Edward Walker filed the Complaint in this action;

6 WHEREAS, on June 28, 2016, on behalf of RCS and Plaintiffs, Defendant RCS filed a
7 Stipulation extending the deadline for RCS to respond to the Complaint to July 29, 2016;

8 WHEREAS, on July 20, 2016, Plaintiffs filed the First Amended Complaint (“FAC”);

9 WHEREAS, on August 8, 2016, on behalf of RCS and Plaintiffs, Defendant RCS filed a
10 Stipulation extending the deadline for RCS to respond to the FAC to August 22, 2016;

11 WHEREAS, on August 18, 2016, on behalf of Ditech and Plaintiffs, Plaintiffs filed a
12 Stipulation and Proposed Order extending the deadlines for the Opposition and Reply to Ditech’s
13 Motion to Dismiss to August 31 and September 7, 2016, respectively;

14 WHEREAS, on August 30, 2016, this Court issued an order granting Plaintiffs’ Stipulation
15 extending the deadlines for the Opposition and Reply to Ditech’s Motion to Dismiss;

16 WHEREAS, on September 8, 2016, on behalf of all parties, Defendant RCS filed a
17 Stipulation and Proposed Order extending the deadlines regarding the meet and confer and the
18 initial disclosures to September 23 and November 7, 2016, respectively;

19 WHEREAS, on September 14, 2016, this Court issued an order granting RCS’s stipulation
20 extending the deadlines for the meet and confer and the initial disclosures;

21 WHEREAS, RCS and Ditech separately filed Motions to Dismiss set for hearing on
22 October 6, 2016;

23 WHEREAS, on October 6, 2016, this Court issued an order granting Defendants’ Motions
24 to Dismiss in their entirety, with leave to amend;

25 WHEREAS, on November 4, 2016, Plaintiffs filed the Second Amended Complaint
26 (“SAC”);

27 WHEREAS, the current deadline for the Parties to provide initial disclosures is November
28 7, 2016;

1 WHEREAS, after the Court’s October 6, 2016 order granting defendants’ Motions to
2 Dismiss, there was no operative pleading on file until November 4, 2016;

3 WHEREAS, the pleadings are not yet settled in this case;

4 WHEREAS, defendants have just received and are beginning to digest and analyze the
5 SAC;

6 WHEREAS, it is in the interest of judicial economy and preservation of the Court’s and
7 the parties’ resources for the parties to temporarily hold off on initial disclosures, until the parties
8 have a better idea which claims remain at issue;

9 WHEREAS, no party will suffer any prejudice as a result of this Stipulation;

10 WHEREAS, the Parties met and conferred on November 3 and 4, 2016, regarding
11 extending the initial disclosure deadline;

12 WHEREAS, this Stipulation is without prejudice to, or waiver of, any rights or defenses
13 otherwise available to the Parties in this action.

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NOW THEREFORE, the Parties hereby stipulate and agree as follows:

- 1. The deadline for each party to provide initial disclosures is extended until and including January 6, 2017.

SO STIPULATED.

Respectfully submitted,

Dated: November 7, 2016

By: /s/ Todd A. Boock
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 RESIDENTIAL CREDIT SOLUTIONS, INC.

Dated: November 7, 2016

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Dated: November 7, 2016

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[PROPOSED] ORDER

Upon review of the Parties' stipulation, and good cause appearing, IT IS HEREBY ORDERED as follows:

1. The deadline for each party to provide initial disclosures is extended until and including January 6, 2017.

Dated: 11/15, 2016



HON. KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE