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7 [ADDITIONAL COUNSEL LISTED IN SIGNATURE
 8 BLOCKS]

9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**
 11 **OAKLAND DIVISION**

12 LESLIE EDWARD WALKER and ELAHE S.
 WALKER,

13 Plaintiffs,

14 v.

15 DITECH FINANCIAL, LLC; RESIDENTIAL
 16 CREDIT SOLUTIONS, INC.; and DOES 1-10,

17 Defendants.

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

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

Judge: Hon. Kandis A. Westmore

Current Initial
 Disclosures Date: January 6, 2017

New Initial
 Disclosures Date: March 6, 2017

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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”);
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1 WHEREAS, on November 7, 2016, on behalf of all parties, Defendant RCS filed a
2 Stipulation and Proposed Order extending the deadlines regarding the initial disclosures to January
3 6, 2017;

4 WHEREAS, on November 16, 2016, this Court issued an order granting RCS's stipulation
5 extending the deadlines for the initial disclosures;

6 WHEREAS, RCS and Ditech subsequently filed separate Motions to Dismiss the SAC, set
7 for hearing on February 2, 2017;

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

9 WHEREAS, the current deadline for the Parties to provide initial disclosures is January 6,
10 2017;

11 WHEREAS, it is in the interest of judicial economy and preservation of the Court's and
12 the parties' resources for the parties to temporarily hold off on initial disclosures, until the parties
13 have a better idea which claims, if any, remain at issue;

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

15 WHEREAS, the Parties met and conferred on January 4, 2017, regarding extending the
16 initial disclosure deadline;

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

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

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

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5 **SO STIPULATED.**

6 Respectfully submitted,

7 Dated: January 6, 2017

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15 RESIDENTIAL CREDIT SOLUTIONS, INC.

16 Dated: January 6, 2017

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29 Dated: January 6, 2017

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~~[PROPOSED]~~ ORDER

Upon review of the Parties' stipulation, and good cause appearing, PURSUANT TO
STIPULATION, IT IS SO ORDERED as follows:

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

Dated: 1/10, 2017



HON. KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE