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12 Attorneys for Defendant
13 Wells Fargo Bank, N.A.

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

17 VANA FOWLER, individually and on
18 behalf of all others similarly situated,

19 Plaintiff,

20 vs.

21 WELLS FARGO BANK, N.A.,

22 Defendant.
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CASE NO. 4:17-cv-02092-HSG

**JOINT STIPULATION TO STAY
DEADLINES IN SCHEDULING ORDER
PENDING MEDIATION AND
~~PROPOSED~~ ORDER**

The Hon. Haywood S. Gilliam, Jr.

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Vana Fowler and Defendant Wells
2 Fargo Bank, N.A., hereby stipulate through their respective counsel of record as follows:

3 WHEREAS, on October 9, 2017, the parties submitted a Stipulated Case Schedule [D.E.
4 49];

5 WHEREAS, on October 13, 2017, the Court issued a Scheduling Order [D.E. 50];

6 WHEREAS, the parties have agreed to mediate this case before Hon. Daniel Weinstein
7 (Ret.) on January 15, 2018;

8 WHEREAS, the parties believe a stay of all deadlines in this case will aid the parties in
9 their efforts to resolve this litigation and avoid any unnecessary time and expense associated with
10 meeting the existing deadlines in the event this case is resolved at mediation;

11 WHEREAS, the parties have exchanged sufficient written discovery, including class
12 discovery, to have informed and productive settlement discussions;

13 WHEREAS, the parties believe that it will be more productive for the parties to focus on
14 mediation, rather than incurring the cost and expense of additional discovery, including
15 depositions and expert discovery;

16 WHEREAS, the next deadlines in this case are Amendment of Pleadings due December
17 11, 2017; Plaintiff's Expert Report due December 31, 2017; Close of Fact Discovery due January
18 19, 2018; and Defendant's Expert Report due January 31, 2017 [D.E. 50];

19 WHEREAS, if the parties are unable to fully resolve this case at mediation, the Parties will
20 submit a proposed schedule to the Court no later than one week following mediation to address
21 any deadlines affected by this stay;

22 WHEREAS, the parties have not previously requested an extension of the deadlines in the
23 Scheduling Order and have mutually agreed to the proposed stay;

24 NOW THEREFORE the parties through their undersigned counsel hereby stipulate to, and
25 respectfully request the Court to order, that the deadlines set forth in the Court's Scheduling Order
26 [D.E. 50] be stayed until the parties complete mediation on January 15, 2018.

27 **IT IS SO STIPULATED.**
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3 DATED: November 20, 2017
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5 /s/ *Michael F. Ram*

6 Michael F. Ram
7 Robins Kaplan, LLP
8 2440 W El Camino Real, Suite #100
Mountain View, CA 94040

9 *Counsel for Plaintiff Vana Fowler*

/s/ *K. Issac deVyver*

K. Issac deVyver
McGuireWoods LLP
Tower Two-Sixty
260 Forbes Avenue, Suite 1800
Pittsburgh, PA 15222-3142

Counsel for Defendant Wells Fargo Bank, N.A.

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11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
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14 Dated: 11/21/2017


Honorable Haywood S. Gilliam, Jr.
United States District Judge

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ATTESTATION

I, K. Issac de Vyver, am the ECF user whose identification and password are being used to file this Joint Stipulation to Stay Deadlines in Scheduling Order Pending Mediation and [Proposed] Order. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Michael F. Ram concurs in this filing.

DATED: November 20, 2017

McGUIREWOODS LLP

By: /s/ K. Issac deVyver