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13 *Attorneys for Plaintiffs and the proposed Classes*

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

17 NELSON SEQUEIRA, ORSAY ALEGRIA,
 and ISMAEL CORDERO, individually and on
 18 behalf of all others similarly situated,

19 *Plaintiffs,*

20 *v.*

21 U.S. DEPARTMENT OF HOMELAND
 SECURITY; U.S. IMMIGRATION &
 22 CUSTOMS ENFORCEMENT; WESTERN
 UNION FINANCIAL SERVICES, INC., a
 23 Colorado corporation; CONTINENTAL
 EXCHANGE SOLUTIONS, INC., a Kansas
 24 corporation, d/b/a RIA FINANCIAL
 SERVICES and AFEX MONEY EXPRESS;
 25 VIAMERICAS CORPORATION, a Delaware
 Corporation; and DOLEX DOLLAR
 26 EXPRESS, INC., a Texas corporation,
 27

28 *Defendants.*

Case No. 4:22-cv-07996-HSG
 Hon. Haywood S. Gilliam, Jr.

**JOINT STIPULATION AND
 ORDER RE: DEADLINE TO FILE
 SECOND AMENDED COMPLAINT**

Action Filed: December 12, 2022
 Trial Date: None Set

1 **STIPULATION**

2 WHEREAS, Plaintiffs Nelson Sequeira, Orsay Alegria, and Ismael Cordero (“Plaintiffs”)
3 filed their First Amended Complaint (“FAC”) on January 24, 2023, *see* Docket No. 38;

4 WHEREAS, Defendants moved to dismiss the FAC on March 3, 2023, *see* Docket Nos. 63
5 (Viamericas), 64 (Continental), 65 (Dolex), 68 (U.S. Immigration & Customs Enforcement and U.S.
6 Department of Homeland Security), and 69 (Western Union).

7 WHEREAS, the Court granted in part and denied in part Defendants’ Motions to Dismiss,
8 Docket Nos. 63–65, 68–69, and ordered that any amended pleadings be filed by April 18, 2024.
9 Docket No. 116.

10 WHEREAS, on April 11, 2024, Defendant Western Union requested to meet-and-confer with
11 Plaintiffs regarding whether Western Union offers lending or credit services prior to the filing of a
12 Second Amended Complaint, and Plaintiffs agreed to do so, given that the process may inform
13 whether a Right to Financial Privacy Act claim is re-alleged as to Western Union. Plaintiffs and
14 Western Union respectfully request that the Court allow the meet-and-confer to be completed prior
15 to the filing of a Second Amended Complaint;

16 WHEREAS, the remaining Defendants do not object to this extension.

17 **BASED ON THE FOREGOING, AND PURSUANT TO CIVIL LOCAL RULE 6-1(b),**
18 **THE UNDERSIGNED PARTIES HEREBY STIPULATE AND AGREE:**

19 The schedule should be revised as follows for Plaintiffs:

- 20 • Deadline to File Second Amended Complaint: May 9, 2024.

21 **SO STIPULATED.**

22 Dated: April 17, 2024

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Dated: April 17, 2024

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Dated: April 17, 2024

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Dated: April 17, 2024

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Dated: April 17, 2024

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Attorney for Federal Defendants

ATTESTATION OF ELECTRONIC SIGNATURE

I hereby attest that pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), I have obtained authorization from the above signatories representing Defendants to file the above-referenced document, and that the above signatories concur in the filing's content.

/s/ Yaman Salahi
Yaman Salahi

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ORDER

Pursuant to the foregoing stipulation and Civil Local Rule 6-1(b), the Court **ORDERS** as follows:

- Deadline to File Second Amended Complaint: May 9, 2024

IT IS SO ORDERED.

DATED: 4/18/2024


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