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10 Attorneys for Defendants WELLS FARGO BANK, N.A.,
 WELLS FARGO ASSET SECURITIES CORPORATION,
 11 FRANKLIN CODEL, DOUGLAS JOHNSON, DAVID
 MOSKOWITZ, and THOMAS NEARY
 12

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

15 IN RE WELLS FARGO MORTGAGE-
 16 BACKED CERTIFICATES LITIGATION

Civil Action No. 09-01376-LHK (PSG)

17 CONSOLIDATED CLASS ACTION ECF

18 **STIPULATION AND ORDER**
SHORTENING TIME FOR WELLS FARGO
DEFENDANTS’ MOTION TO COMPEL

19 Judge: Honorable Paul S. Grewal

1 WHEREAS on February 8, 2011, Lead Plaintiffs filed a motion to compel documents
2 from Defendants Wells Fargo Bank, N.A. and Wells Fargo Asset Securities Corporation and
3 noticed their motion for a hearing on March 15, 2011, in accordance with the Local Rules;

4 WHEREAS Defendants Wells Fargo Bank, N.A., Wells Fargo Asset Securities
5 Corporation, Franklin Codel, Douglas Johnson, David Moskowitz, and Thomas Neary
6 (collectively, the “Wells Fargo Defendants”) had been preparing their own motion to compel, and
7 are filing it concurrently with this stipulation;

8 WHEREAS the Wells Fargo Defendants are noticing their motion to be heard on March
9 22, 2011, the first hearing date that is 35 or more days after filing;

10 WHEREAS the Wells Fargo Defendants believe that it would serve the cause of judicial
11 efficiency to have both motions heard on March 15, 2011 and would conserve the resources of the
12 parties to have both motions heard together, particularly given that counsel otherwise would have
13 to travel from out of town for two hearings a week apart;

14 WHEREAS the Wells Fargo Defendants believe that their motion should be heard at the
15 earliest opportunity given their April 7, 2011 deadline to oppose Plaintiffs’ class certification
16 motion;

17 WHEREAS Lead Plaintiffs do not object to shortening time for the Wells Fargo
18 Defendants’ Motion on the terms set forth herein;

19 WHEREAS the parties therefore submit this stipulation to shorten time on the Wells
20 Fargo Defendants’ motion to 32 days, to set a briefing schedule, and to reschedule the noticed
21 hearing date from March 22, 2011 to March 15, 2011;

22 WHEREAS under this stipulation, the motion would be fully briefed 12 days before the
23 hearing on the motion;

24 NOW THEREFORE, IT IS HEREBY STIPULATED BY AND AMONG THE PARTIES
25 HERETO AND THEIR COUNSEL OF RECORD THAT (a) the 35-day notice requirement of
26 Local Rule 7-2 shall be shortened to 32 days with respect to the Wells Fargo Defendants’ motion
27 to compel; (b) Plaintiffs’ papers in opposition to the motion shall be due by February 25, 2011
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