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12 Attorneys for defendant
 13 Midland Credit Management, Inc.,
 14 erroneously sued as Midland Credit
 15 Management

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN JOSE DIVISION

19 ROSA ISELA LEDESMA,
 20 Plaintiff,

21 vs.

22 TRANS UNION LLC; MIDLAND
 23 CREDIT MANAGEMENT,
 24 Defendants.

25 CASE NO. CV12-00495-LHK

26 **SECOND STIPULATION TO
 27 EXTEND DEFENDANT MIDLAND
 28 CREDIT MANAGEMENT'S TIME
 TO RESPOND TO COMPLAINT**

Complaint Served: February 16, 2012

Current Response Date: March 22, 2012

New Response Date: April 5, 2012

1 WHEREAS the Complaint in this action was filed on January 31, 2012;

2 WHEREAS Defendant Midland Credit Management, Inc. (“Defendant”) was
3 served with the Complaint on February 16, 2012;

4 WHEREAS Defendant’s response to the Complaint was due on March 8, 2012;

5 WHEREAS the parties stipulated to, and the Court granted, an extension of
6 time for Defendant to respond to the Complaint up to and including March 22, 2012;

7 WHEREAS the Complaint references a document that is attached thereto as
8 Exhibit A (*See* Complaint ¶ 8);

9 WHEREAS the Complaint Defendant received did not contain a document
10 attached thereto as Exhibit A;

11 WHEREAS on March 16, 2012, Defendant requested that Plaintiff provide a
12 copy of the document referenced in the Complaint as Exhibit A;

13 WHEREAS On March 19, 2012, Plaintiff provided Defendant a copy of the
14 document referenced in the Complaint as Exhibit A;

15 WHEREAS Defendant requires additional time to review Exhibit A and
16 investigate the claims asserted in the Complaint;

17 WHEREAS Plaintiff has agreed to grant Defendant an extension of time to
18 respond to the Complaint up to and including April 5, 2012;

19 WHEREAS on March 19, 2012, the Court issued an Order reassigning the case
20 to the Honorable Lucy K. Koh and vacating all matter presently scheduled for
21 hearing;

22 WHEREAS as of the filing of this stipulation, this Court has not issued an
23 Order setting an initial case management conference;

24 WHEREAS the requested extension of time will have no effect on the case
25 schedule,

26 THEREFORE plaintiff Rosa Isela Ledesma and defendant Midland Credit
27 Management, Inc., by and through their counsel, hereby stipulate and agree pursuant
28

1 to Local Rule 6-1(a), that Defendant may have up to and including April 5, 2012, to
2 answer or otherwise respond to the Complaint filed in this action.

3 IT IS SO STIPULATED.

4
5
6 DATED: March 21, 2012

SIMMONDS & NARITA LLP
TOMIO B. NARITA
R. TRAVIS CAMPBELL

7
8 By: s/R. Travis Campbell
9 R. Travis Campbell
10 Attorneys for Defendant
11 Midland Credit Management, Inc., erroneously
12 sued as Midland Credit Management

13 DATED: March 21, 2012

14 STEBURG LAW FIRM
15 ANITA STEBURG

16 By: s/Anita Steburg
17 Anita Steburg
18 Attorneys for Plaintiff
19 Rosa Isela Ledesma

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: March 22, 2012

22 Lucy H. Koh
23 Hon. Lucy K. Koh
24 U.S. District Judge
25
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