

1 **BRYAN CAVE LLP**
 Daniel Rockey, California Bar No. 178604
 2 Goli Mahdavi, California Bar No. 245705
 David A. Owens, California Bar No. 273179
 3 333 Market Street, 25th Floor
 San Francisco, CA 94105
 4 Telephone: (415) 675-3400
 Facsimile: (415) 675-3434
 5 Email: daniel.rockey@bryancave.com
 goli.mahdavi@bryancave.com
 6 owensd2@bryancave.com

7 Attorneys for Defendant
 JPMORGAN CHASE BANK, N.A.

8 **UNITED STATES DISTRICT COURT**
 9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 10 **OAKLAND DIVISION**

BRYAN CAVE LLP
 333 MARKET STREET, 25TH FLOOR
 SAN FRANCISCO, CA 94105

12 TIMOTHY ZORIO, an individual,
 13 Plaintiff,
 14 v.
 15 EXPERIAN INFORMATION
 SOLUTIONS, INC.; TRANS UNION
 16 L.L.C; EQUIFAX INFORMATION
 SERVICES, L.L.C., JPMORGAN CHASE
 17 BANK, N.A.; SETERUS, INC. formerly
 known as IBM LENDER BUSINESS
 18 PROCESS SERVICES, INC.,
 19 Defendants.

Case No.: CV12-00498 LHK
**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND TIME TO
 RESPOND TO FIRST AMENDED
 COMPLAINT**
 Judge: Honorable Lucy H. Koh
 Date Action Filed: January 31, 2012
 Trial Date: Not Assigned

21
 22
 23
 24
 25
 26
 27
 28

1 Defendant JPMorgan Chase Bank, N.A. (“Defendant”) and Plaintiff Timothy Zorio
2 (“Plaintiff”) (Defendant and Plaintiff are referred to collectively herein as the “Parties”), by and
3 through their counsel of record, hereby stipulates as follows:

4 WHEREAS, Plaintiff filed a Complaint on January 31, 2012 in United States District
5 Court; and

6 WHEREAS, Defendant was served on Defendant on February 9, 2012; and

7 WHEREAS, Defendant’s filed a Motion to Dismiss the Complaint on March 1, 2012; and

8 WHEREAS, Defendant’s Motion to Dismiss the Complaint was granted with leave to
9 amend on October 1, 2012; and

10 WHEREAS, Plaintiff filed a First Amended Complaint was filed on October 22; and

11 WHEREAS, Defendant has until December 10, 2010 to file a responsive pleading;

12 WHEREAS, Northern District of California Local Rule 6-2 (b) provides that the Court
13 may extend the time for a party to respond;

14 WHEREAS, the undersigned Parties stipulate to extend Defendant’s time to move against,
15 answer, or otherwise respond to the Plaintiff’s First Amended Complaint be extended to January
16 10, 2012;

17 WHEREAS, the Parties are engaged in settlement discussions to resolve this matter
18 amicably, and the Parties agree that judicial economy and the interests of the Parties in avoiding
19 unnecessary expenses would be best served and promoted by extending the time required for
20 Defendants to respond to the First Amended Complaint;

21 NOW, THEREFORE, the undersigned parties stipulate that the time for Defendant to
22 move against, answer, or otherwise respond shall be extended to January 10, 2012;

23 This stipulation is not a waiver by either of the Parties to this stipulation as to any rights,
24 claims, nor defenses, including venue, as to this action. This stipulation may be executed in
25 counterparts, including by signature, by facsimile, or electronically.

26
27 Dated: December 7, 2012
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BRYAN CAVE LLP
Daniel Rockey
Goli Mahdavi
David A. Owens

By: /s/ David A. Owens
Attorneys for Defendant
JPMorgan Chase Bank, N.A.

Dated: December 7, 2012

STEBURG LAW FIRM
Anita L. Steburg

By: /s/ Anita L. Steburg
Attorneys for Plaintiff
Timothy Zorio

1 ~~[PROPOSED ORDER]~~

2 Pursuant to the Stipulation to Extend Time to Respond to First Amended Complaint,

3 **IT IS HEREBY ORDERED THAT:**

4 1. Defendant shall have until January 10, 2012 to file a response to Plaintiff's First
5 Amended Complaint.

6
7 Dated: December 11, 2012

8 
9 Honorable Lucy H. Koh
10 United States District Judge