



1 Brett D. Watson, SBN: 203183  
E-Mail: bwatson@pdlawyers.com  
2 Chetna Vora, SBN: 223311  
E-Mail: cvora@pdlawyers.com  
3 PALMER, LOMBARDI & DONOHUE LLP  
4 515 South Flower Street, Suite 2100  
Los Angeles, California 90071  
5 Phone: (213) 688-0430  
Fax: (213) 688-0440

6 Attorneys for Defendant MUFG Union Bank, N.A.

11/6/2015

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 KATHLEEN MAGEE,  
11 Plaintiff,

12 vs.

13 EXPERIAN INFORMATION  
14 SOLUTIONS, INC., ET AL.,  
15 Defendants.

Case No. 15-cv-04258-EJD

[Honorable Edward J. Davila]

**REQUEST AND STIPULATION TO  
CONTINUE DATE FOR  
DEFENDANT MUFG UNION BANK,  
N.A.'S RESPONSE TO PLAINTIFF'S  
COMPLAINT**

[New Response Date for Defendant  
MUFG Union Bank, N.A.: November 16  
2015]

Action Filed: August 4, 2015

16  
17  
18  
19  
20 TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN  
21 DISTRICT OF CALIFORNIA, ALL PARTIES AND THEIR ATTORNEYS OF  
22 RECORD:

23 Defendant MUFG Union Bank, N.A. ("Union Bank") and Plaintiff Kathleen  
24 Magee ("Magee") are actively discussing settlement of this case but need additional  
25 time to determine whether they can avoid further pleadings through settling the  
26 action or whether a response will be necessary.

27 Magee filed her Complaint in state court on August 4, 2015. Defendant  
28 Experian Information Solutions removed this case to federal court on or around

PALMER, LOMBARDI & DONOHUE LLP  
515 South Flower Street, Suite 2100  
Los Angeles, California 90071

1 September 18, 2015. Magee and Union Bank stipulate that Union Bank has up to  
2 and including November 16, 2015 to respond to the Complaint. This extension will  
3 not alter any Court set dates. Union Bank has not waived any objection to the venue  
4 or to the jurisdiction of the court over the person of the defendant, or any other  
5 challenge to the Complaint or other pleadings in this case.  
6

7 DATED: November 5, 2015

8 By           /s/ Brett D. Watson            
9 BRETT D. WATSON  
10 CHETNA VORA  
11 PALMER, LOMBARDI & DONOHUE LLP  
12 Attorneys for Defendant MUFG Union  
13 Bank, N.A.

14 DATED: November 5, 2015

15 By           /s/ Elliot Gale            
16 ELLIOT GALE  
17 SAGARIA LAW P.C.  
18 Attorneys for Plaintiff Kathleen Magee  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28