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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRICIA BENAVENTE, and  
 ANDRESINA BENAVENTE,

Plaintiffs,

vs.

NATIONAL COLLEGIATE  
 STUDENT LOAN TRUST 2007-3, A  
 DELAWARE STATUTORY  
 TRUST(S), and PATENAUDE &  
 FELIX, A.P.C,

Defendants.

Case No. 14-CV-01992-GMN-VCF

JOINT MOTION TO TRANSFER  
 AND CONSOLIDATE CLASS  
 ACTION CASE

DAWN ZOERB, Individually and On  
 Behalf of Others Similarly Situated,

Plaintiff,

vs.

NATIONAL COLLEGIATE  
 STUDENT LOAN TRUST 2006-3, A  
 Delaware Statutory Trust(s); and,  
 LAW OFFICES OF PATENAUDE &  
 FELIX, A.P.C.,

Defendants.

Case No.: 14-cv-00468-BAS-KSC

JOINT MOTION TO TRANSFER AND CONSOLIDATE CLASS ACTION CASE

1 IT IS HEREBY STIPULATED AND CONSENTED BY AND BETWEEN  
2 THE PARTIES, Plaintiffs Tricia Benavente and Andresina Benavente  
3 (“Plaintiffs”) and Defendants National Collegiate Student Loan Trust 2007-3 and  
4 the Law Offices of Patenaude & Felix, A.P.C. (“Defendants”), through  
5 undersigned counsel, to transfer the above-referenced case entitled Benavente v.  
6 National Collegiate Student Loan Trust 2007-3, et al., Case No. 14-CV-01992-  
7 GMN-VCF (D. Nev) to the U.S. District Court for the Southern District of  
8 California, and to consolidate the action with the pending action entitled Zoerb v.  
9 National Collegiate Student Loan Trust 2006-3, et al., Case No. 14-cv-00468-  
10 BAS-KSC (S.D. Cal.).  
11

12 WHEREAS, for the convenience of parties and witnesses, in the interest of  
13 justice, a district court may transfer any civil action to any other district or  
14 division where it might have been brought or to any district or division to which  
15 all parties have consented. 28 U.S.C. § 1404(a).

16 WHEREAS the civil action filed by Plaintiffs involves common defendants  
17 and common questions of law and fact as to Zoerb v. National Collegiate Student  
18 Loan Trust 2006-3 et al., Case No. 14-cv-00468-BAS-KSC (S.D. Cal.).

19 WHEREAS all parties are actively engaging in good faith settlement  
20 negotiations.

21 WHEREAS all parties have recently reached a tentative settlement  
22 agreement in Zoerb v. National Collegiate Student Loan Trust 2006-3 et al., Case  
23 No. 14-cv-00468-BAS-KSC (S.D. Cal.), which seeks to include the claims raised  
24 by Plaintiffs.

25 WHEREAS, upon transfer, Plaintiffs’ class action case should be  
26 consolidated under Zoerb v. National Collegiate Student Loan Trust 2006-3 et al.,  
27 Case No. 14-cv-00468-BAS-KSC (S.D. Cal.).  
28

1 WHEREAS counsel for Plaintiffs and Defendants certify by their signatures  
2 below that upon filing this document it has been deemed acceptable to all persons  
3 required to sign, and each have authorized the use of their electronic signature.

4 IT IS SO STIPULATED.

5 KAZEROUNI LAW GROUP, APC

6  
7 Dated: May 4, 2015

/s/Danny Horen

8 Danny Horen

Attorney for Plaintiffs

9 Tricia Benavente and Andresina Benavente

10 Dated: May 4, 2015

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.C.

11  
12 /s/James K. Shultz

13 James K. Shultz

Attorney for Defendant

14 National Collegiate Student Loan Trust 2007-3

15 Dated: May 4, 2015

PATENAUDE & FELIX A.P.C.

16  
17 /s/Westley Villanueva

18 Westley Villanueva

Attorney for Defendant

19 Patenaude & Felix, APC

20  
21 The Clerk of Court is directed to close this case.

22  
23  
24 **ORDER**

25 IT IS SO ORDERED.

26   
27 HON. CAM FERENBACH

UNITED STATES MAGISTRATE JUDGE