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13 Attorneys for Defendant
Ditech Financial LLC
14 formerly known as
Green Tree Servicing LLC
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16 UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA

18 Lee C. Kamimura, individually and all
others similarly situated,
19
20 Plaintiff,
21
22 vs.
23 Ditech Financial LLC formally known
as Green Tree Servicing, LLC,
24
25 Defendant.

Case No. 2:16-cv-00783-APG-CWH
**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
CASE DEADLINES**

25 Plaintiff Lee C. Kamimura (“Plaintiff”) and Defendant Ditech Financial LLC,
26 fka Green Tree Services LLC (“Defendant” and together with Plaintiff, the
27 “Parties”) by and through their counsel of record hereby stipulate to extend the
28 following deadlines in this case:

- 1 (1) The deadline for Defendant to file its opposition to Plaintiff's motion for
2 class certification will be March 30, 2018;
- 3 (2) The deadline for Plaintiff to file his reply in support of his motion for class
4 certification will be April 13, 2018; and
- 5 (3) The deadline by which the Parties must file their Proposed Joint Pretrial
6 Order will be April 9, 2018, the current deadline to file dispositive motions.

7 The current deadline for Ditech to file its opposition to Plaintiff's motion for
8 class certification is March 28, 2018. See Dkt. No. 62. The current deadline for
9 Plaintiff to file his reply brief in support of the motion for class certification is April
10 11, 2018. *Id.* The current deadline for the parties to file their Proposed Joint
11 Pretrial Order is March 30, 2018. Dkt. No. 44.

12 Good cause exists to amend the deadline by which Defendant must file its
13 opposition to Plaintiff's Motion for Class Certification as Defendant needs two
14 additional days to finalize the opposition. Accordingly, the parties have also agreed
15 to allow Plaintiff an additional two days to file his reply. Moreover, good cause
16 exists to extend the deadline by which the Parties must file their Proposed Joint
17 Pretrial Order to after the deadline by which the Parties must file their dispositive
18 motions given that they deadline may be suspended if and when the parties file
19 dispositive motions.

20 The Parties are also continuing to actively discuss an informal resolution to
21 this matter.

22 The Parties respectfully propose the following briefing schedule:

- 23 (1) The deadline for Defendant to file its opposition to Plaintiff's motion for
24 class certification will be March 30, 2018;
- 25 (2) The deadline for Plaintiff to file his reply in support of his motion for class
26 certification will be April 13, 2018; and
- 27 (3) The deadline by which the Parties must file their Proposed Joint Pretrial
28 Order will be April 9, 2018.

1 The Court has not yet set a hearing for the Motion for Class Certification.
2 Therefore, this additional two-day extension (and total nine-day extension) will not
3 affect any previous hearing dates set by the Court.

4 This is the Parties' seventh request for an extension of the class certification
5 motion deadlines, and the second request for an extension of the response deadline
6 for the opposition to the class certification motion.

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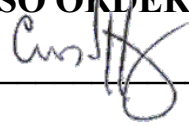
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~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED that:

- (1) The deadline for Defendant to file an opposition to Plaintiff’s motion for class certification will be March 30, 2018;
- (2) The deadline for Plaintiff to file his reply brief will be April 13, 2018; and
- (3) The deadline by which the Parties must file their Proposed Joint Pretrial Order will be April 9, 2018.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: March 27, 2018