

1 Don Springmeyer
 Nevada Bar No. 1021
 2 Bradley S. Schrager
 Nevada Bar No 10217
 3 WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP
 3556 E. Russell Road, Second Floor
 4 Las Vegas, Nevada 89120
 Telephone: 702-341-5200
 5 Facsimile: 702-341-5300
 dspringmeyer@wrslawyers.com
 6 bschrager@wrslawyers.com

7 Attorneys for Plaintiffs MAUREEN CLARK and
 SONYA ALEXANDER

8 (Additional counsel listed in signature page)
 9

10 UNITED STATES DISTRICT COURT
 11 DISTRICT OF NEVADA

12 MAUREEN CLARK and SONYA
 ALEXANDER, individually, and on behalf of
 13 all others similarly situated,

14 Plaintiff,

15 vs.

16 BANK OF AMERICA, N.A.,

17 Defendant.

CASE NO. 2:16-cv-02228-GMN-VCF

**STIPULATION AND ORDER
 REGARDING SETTLEMENT OF
 MATTER AND UPCOMING STATUS
 HEARING**

Complaint Filed: September 21, 2016

18
 19 Plaintiffs Maureen Clark and Sonya Alexander, on behalf of themselves and all persons
 20 who have opted in to this action (collectively “Plaintiffs”), and Defendant Bank of America,
 21 N.A., hereby notify the Court that the parties have reached an agreement in principle to settle the
 22 entire matter pursuant to a proposed collective action settlement, subject to the Court’s approval
 23 and to their conferring regarding the terms and drafting/execution of the formal proposed
 24 settlement agreement. The parties presently intend to file a Motion for Approval of Settlement in
 25 approximately 45 days.

26 Accordingly, the parties hereby request that all current deadlines and events be vacated,
 27 including the Status Hearing on the Discovery Plan and Scheduling Order currently set for
 28

1 February 10, 2020 in Courtroom D with Magistrate Judge Ferenbach.

2 **STIPULATION**

3 NOW THEREFORE, the parties hereby agree and stipulate as follows:

4 The current pleading and discovery deadlines in this matter should be vacated.

5 The Status Hearing currently scheduled for February 10, 2020 should be vacated; and

6 The parties shall file a Motion for Approval of Settlement in 45 days, or, if not possible by that
7 time, file a joint status report regarding the anticipated date for filing.

8 DATED: January 31, 2020.

9 **WOLF, RIFKIN, SHAPIRO,
10 SCHULMAN & RABKIN, LLP**

MCGUIREWOODS LLP

11 By: /s/ Don Springmeyer
12 Don Springmeyer - NSB 1021
13 Bradley S. Schrager - NSB 10217
14 3556 E. Russell Road, Second Floor
15 Las Vegas, Nevada 89120
16 Telephone: 702-341-5200/Fax: 702-341-5300

By: /s/ Matthew C. Kane
Matthew C. Kane (admitted pro hac vice)
(California SBN #171829)
Remy Kessler (admitted pro hac vice)
(California SBN #123165)
1800 Century Park East, 8th Floor
Los Angeles, California 90067-1501
Telephone: 310.315.8200
Facsimile: 310.315.8210

14 Kevin J. Stoops (admitted pro hac vice)
(Michigan SBN P64371)
15 **SOMMERS SCHWARTZ, P.C.**
16 One Towne Square, 17th Floor
17 Southfield, Michigan 48076
18 Telephone: 248.236.5752/Fax: 248.936.2143
19 kstoops@sommerspc.com

Sheri M. Thome
Nevada Bar No. 8657
Chad C. Butterfield
Nevada Bar No. 10532
**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**
300 South 4th Street, 11th Floor,
Las Vegas, Nevada 89101
Telephone: 702.727.1400
Facsimile: 702.727.1401

18 Jason T. Brown (admitted pro hac vice)
(New Jersey SBN 035921996)
19 Nicholas Conlon (admitted pro hac vice)
(New Jersey SBN 034052013)
20 **BROWN, LLC**
21 111 Town Square Place, Suite 400
22 Jersey City, New Jersey 07310
23 Telephone: 201.630.0000
24 jtb@jtblawgroup.com
25 nicholasconlon@jtblawgroup.com

Attorneys for Defendant
BANK OF AMERICA, N.A.

24 Attorneys for Plaintiffs MAUREEN CLARK
and SONYA ALEXANDER

25 ///

26 ///

1 **IT IS SO ORDERED.**

2 Dated this 4th day of February, 2020.

3
4 
5 UNITED STATES MAGISTRATE JUDGE

6 **CERTIFICATE OF SERVICE**

7 I hereby certify that on this 31st day of January, 2020, a true and correct copy
8 of **STIPULATION AND ORDER REGARDING SETTLEMENT OF MATTER** was served
9 via the United States District Court CM/ECF system on all parties or persons requiring notice.
10

11 By /s/ Christie Rehfeld
12 Christie Rehfeld, an Employee of
13 WOLF, RIFKIN, SHAPIRO, SCHULMAN &
14 RABKIN, LLP
15
16
17
18
19
20
21
22
23
24
25
26
27
28