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*Attorneys for Defendant United Federal
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**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

TONYA GUNTER, individually, and on behalf
 of all others similarly situated,

Plaintiff,

v.

UNITED FEDERAL CREDIT UNION, DOES
 1-5 inclusive and ROE CORPORATIONS 6-10
 inclusive,

Defendants.

Case No.: 3:15-cv-00483-MMD-WGC

Judge Miranda M. Du

Stipulation for Extension of Time

1 **Stipulation for Extension of Time**

2 Plaintiff Tonya Gunter (“Gunter”) and defendant United Federal Credit Union (“United”)
3 (United and Gunter are collectively referred to as “the Parties”) by and through their respective
4 counsel of record, stipulate for the Court to enter an Order amending the Scheduling Order (ECF
5 43). As the Parties previously informed the Court, this is a complex consumer class action case
6 that requires extensive discovery not only with respect to written discovery, documents
7 production and depositions, but also to the defendant credit union’s customer account database,
8 which as a result of several mergers, involves multiple complex software platforms, requiring
9 substantial expert witness involvement. United has gathered approximately 7,700 documents
10 consisting of approximately 450,000 pages that are responsive to the 63 requests for production
11 of documents that Plaintiffs propounded. Discovery on class issues prior to the filing of a motion
12 for class certification has taken longer than expected, and indeed longer than a typical complex
13 credit union overdraft fee case, and therefore, Plaintiff has granted an extension for Defendant to
14 respond to her request for production of documents and special interrogatories from March 31 to
15 May 27, 2016. Because of this additional complexity and the volume of documents with respect
16 to discovery, the parties believe that they need additional time before Plaintiff can prepare a class
17 certification motion. The parties submit the following deadlines:
18
19
20

- 21
- 22 1. June 16, 2016 at 10:00 a.m. – Telephone status conference with the Court;
 - 23 2. August 31, 2016 – Deadline to add parties, conduct class certification discovery, and
24 to file a class certification motion;
 - 25 3. October 14, 2016 – Deadline for Defendant to file an opposition to the class
26 certification motion;
- 27
28

1 4. November 18, 2016 – Deadline for Plaintiff to file a reply to the opposition to the class
2 certification motion.

3 If obstacles arise in meeting the above deadlines, then the parties are to discuss those issue
4 with the Court by setting up a status conference call with the Court or raising the issues at the
5 above-mentioned telephone status conference.
6

7 Dated: May 26, 2016

McCUNEWRIGHT, LLP

8 By: /s/ Jae (Eddie) K. Kim (with permission)
9 Richard D. McCune (*Pro Hac Vice*)
10 Jae (Eddie) K. Kim (*Pro Hac Vice*)

11 **GREGORY G. GORDON, LTD**
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13 **THE KICK LAW FIRM, APC**
14 Taras Kick
15 James G. Strenio

16 *Attorneys for Plaintiff Tonya Gunter
and the Putative Class*

17 Dated: May 26, 2016

HOWARD & HOWARD ATTORNEYS, PLLC

18 By: /s/ James A. Kohl
19 James A. Kohl
20 Robert Hernquist

21 *Attorneys for Defendant United Federal
22 Credit Union*

23 **IT IS SO ORDERED:**

24 It is further ordered that the parties shall file a joint status report on or before June 14,
25 2016.

26 William G. Cobb
27 UNITED STATES MAGISTRATE
28 JUDGE