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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **SOUTHERN DIVISION**

18 *In re loanDepot Data Breach Litigation*

Case No. 8:24-cv-00136-DOC-JDE

20 This Document Relates to: All Actions

Assigned for All Purposes to:
Courtroom 10A; Hon. David O. Carter

**JOINT STIPULATION TO
EXTEND DEFENDANT
LOANDEPOT, INC.'S DEADLINE
TO RESPOND TO PLAINTIFFS'
CONSOLIDATED COMPLAINT**

1 Pursuant to Local Rule 7-1, the Parties to the *In re loanDepot Data Breach*
 2 *Litigation*, 8:24-cv-00136-DOC-JDEx, by and through their respective counsel of
 3 record, hereby stipulate and agree to extend Defendant loanDepot, Inc.’s
 4 (“loanDepot” or “Defendant” and, together with Plaintiffs, the “Parties”) deadline to
 5 respond to Plaintiffs’ Consolidated Class Action Complaint as follows:

6 WHEREAS, the Court has consolidated the following actions into the instant
 7 consolidated action: *Isaiah v. loanDepot, Inc.* (Case No. 8:24-cv-00136), *Rosas v.*
 8 *loanDepot, Inc.* (Case No. 8:24-cv-00167), *Eggleton v. loanDepot, Inc.* (Case No.
 9 8:24-cv-00170), *Ware v. loanDepot, Inc.* (Case No. 8:24-cv-00179), *Penird v.*
 10 *loanDepot, Inc.* (Case No. 8:24-cv-00180), *Webbe v. loanDepot, Inc.* (Case No. 8:24-
 11 cv-00190), *Sullivan v. loanDepot, Inc.* (Case No. 8:24-cv-00194), *Rogers v.*
 12 *loanDepot, Inc.* (Case No. 2:24-cv-00766), *Schmidt, et al. v. loanDepot, Inc.* (Case
 13 No. 8:24-cv-00200), *Coe, et al. v. loanDepot, Inc.* (Case No. 8:24-cv-00211), *Six v.*
 14 *loanDepot, Inc.* (Case No. 8:24-cv-00213), *Lako v. loanDepot, Inc.* (Case No. 8:24-
 15 cv-00216), *Joy v. loanDepot, Inc.* (Case No. 8:24-cv-00239), *Costello v. loanDepot,*
 16 *Inc.* (Case No. 8:24-cv-00242), *Massaro, et al. v. loanDepot, Inc.* (Case No. 8:24-cv-
 17 00253), *Martin v. loanDepot, Inc.* (Case No. 8:24-cv-00265), *Bower v. loanDepot,*
 18 *Inc.* (Case No. 8:24-cv-00305), *Nichols v. loanDepot Inc.* (Case No. 8:24-cv-00342),
 19 *Soto, et al. v. loanDepot, Inc.* (Case No. 8:24-cv-00433), *Ryan v. loanDepot, Inc.*
 20 (Case No. 2:24-cv-03630), and *Boykin, et al. v. loanDepot, Inc.* (Case No. 8:24-cv-
 21 01119)¹;

22 WHEREAS, two other related cases, *Shippley v. loanDepot.com, LLC*, Case
 23 No. 2:24-cv-00813-TL (W.D. Wa.) and *Hunter v. loanDepot.com, LLC*, Case No.
 24 4:24-cv-00239-DGK (W.D. Mo.), have since been ordered to be transferred to this
 25 Court from the Western District of Washington and the Western District of Missouri,
 26 respectively. (Case No. 2:24-cv-00813-TL (W.D. Wa.), Dkt. No. 14 and Case No.
 27

28 ¹ *Boykin* was originally filed in the Northern District of Illinois and assigned Case
 No. 1:24-cv-2583 (N.D. Ill.).

1 4:24-cv-00239-DGK (W.D. Mo.), Dkt No. 14.) Transfer was effected in the *Hunter*
2 case on June 24, 2024, and the case was assigned Central District of California Case
3 No. 2:24-cv-05251-MEMF-AS. Transfer was effected in the *Shippley* case on June
4 25, 2024, and the case was assigned Central District of California Case No. 2:24-cv-
5 05210-CAS-KS.² The Parties will seek to consolidate the *Shippley* and *Hunter* cases
6 with the instant action;

7 WHEREAS, on May 9, 2024, the Court entered Case Management Order No.
8 1 (Dkt. No. 55), setting July 3, 2024 as loanDepot’s deadline to respond to the
9 Consolidated Complaint;

10 WHEREAS, on June 3, 2024, Plaintiffs filed their Consolidated Class Action
11 Complaint (Dkt. No. 69), adding seventeen new Plaintiffs and three new causes of
12 action not previously named in any of the underlying actions consolidated herein;

13 WHEREAS, on June 6, 2024, the Parties participated in mediation before Hon.
14 Jay Gandhi (ret.) at JAMS, following which they reached agreement on the general
15 contours of a settlement in principle;

16 WHEREAS, the Parties are working diligently to negotiate the terms of a
17 written settlement agreement, but will be unable to finalize such negotiations in
18 advance of loanDepot’s forthcoming July 3, 2023 response deadline;

19 WHEREAS, the Parties intend to have a settlement agreement negotiated and
20 a motion for preliminary approval filed within ninety (90) days;

21 WHEREAS, in light of the foregoing and in the interest of conserving judicial
22 and party resources, and for good cause therefore, the Parties respectfully request that
23 loanDepot’s deadline to respond to Plaintiffs’ Consolidated Complaint be extended
24 by ninety (90) days, up to and until October 1, 2024;

25 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED,**
26 subject to the approval of the Court, that Defendant’s deadline to respond to
27

28 ² loanDepot notified the Court of these related cases on June 25, 2024. (Dkt. Nos. 76 and 77.)

1 Plaintiffs' Consolidated Class Action Complaint shall be extended by ninety (90)
2 days, from July 3, 2024 to October 1, 2024.

3 **IT IS SO STIPULATED.**

4
5 Dated: June 26, 2024

COOLEY LLP

6
7 By: /s/ Matthew D. Brown

8 Matthew D. Brown

9 Attorneys for Defendant
loanDepot, Inc.

10
11 Dated: June 26, 2024

ROBINSON CALCAGNIE, INC.

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13 By: /s/ Daniel S. Robinson

14 Daniel S. Robinson

15 Interim Co-Lead Counsel for Plaintiffs
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Certification of Compliance with C.D. Cal. L.R. 5-4.3.4

I hereby certify that pursuant to C.D. Cal. L.R. 5-4.3.4, I have obtained the authorization from the above signatories representing Plaintiffs to file the above-referenced document, and that the above signatories concur in the filing’s content.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 26, 2024

COOLEY LLP

By: /s/ Matthew D. Brown
Matthew D. Brown

Attorneys for Defendant
loanDepot, Inc.