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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MICHAEL GARCIA, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

PINGORA LOAN SERVICING, LLC,

Defendant.

Case No. 2:22-cv-00821-JAM-AC

[Solano Superior Court Case No.
FCS058137]

**STIPULATION TO TRANSFER
VENUE**

Pursuant to 28 U.S.C. § 1404(a), Plaintiff Michael Garcia (“Plaintiff”) and Defendant Pingora Loan Servicing, LLC (“Pingora”) (together, the “Parties”) hereby file this Stipulation to Transfer Venue to the United States District Court for the Southern District of Florida. In support of their motion, Plaintiff and Pingora jointly state as follows:

1. On April 22, 2022, Plaintiff filed this action in the Superior Court for the State of California for the County of Solano, asserting claims for violations related to Pingora’s alleged failure to secure Plaintiff’s and Class members’ personally identifiable information.

2. On May 16, 2022, Pingora removed this action to this Court pursuant to 28 U.S.C. §§ 1332, 1441, and 1446;

3. Fourteen related class actions are currently pending in the Southern District of Florida and have been consolidated or are in the process of being consolidated: *Morrill v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-20955-DPG (“*Morrill*”); *Rivera, et al. v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-20968-KMM; *McMahon v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-20978-RNS; *Guarino v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-20981-CMA; *Thomas v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-20984-KMM; *Kunz v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-21003-MGC; *Kimbrough v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-21044-JEM; *Myers v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-21054-DPG; *Riley v. Lakeview Loan Servicing, LLC*, Case No. 0:22-cv-60833-DPG; *Stone v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-21094-DPG; *Rubio v. Lakeview Loan Servicing, LLC*, Case No. 3:22-cv-00603-MMA-JLB (S.D. Cal.); *Villanueva v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-21548-RNS; *Kassem v. Pingora Asset Management LLC, et al.*, Case No. 1:22-cv-21566-KMW; and *Taylor v. Lakeview Loan Servicing, LLC*, Case No. 1:22-cv-21445-DPG (collectively, the “Related Florida Actions”).

4. The Related Florida Actions raise factual and legal issues substantially identical to those raised in this action, against related defendants (*Morrill*, Dkt. 9);

5. Counsel for the Parties have conferred and agree that, under the circumstances, transfer of this action to the Southern District of Florida is appropriate, in the interests of justice, and will promote the convenience of the parties and witnesses.

6. Accordingly, under 28 U.S.C. § 1404(a), the Parties respectfully request that the Court transfer this action to the Southern District of Florida for consolidation with the consolidated action captioned *In re Lakeview Loan Servicing Data Breach Litigation*, Case No. 1:22-cv-20955-DPG (S.D. Fla.).

Dated: May 31, 2022

Respectfully submitted,

/s/ Abbas Kazerounian
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/s/ Teresa C. Chow (as authorized on May 23, 2022)
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Attorneys for Defendant
Pingora Loan Servicing, Inc.

ORDER

Having considered the parties' Stipulation to Transfer Venue to the United States District Court for the Southern District of Florida filed by Plaintiff Michael Garcia and Defendant Pingora Loan Servicing, LLC pursuant to 28 U.S.C. § 1404(a), and for good cause shown, the Court hereby GRANTS the stipulation in the interests of justice and for the convenience of the parties and witnesses.

IT IS HEREBY ORDERED that this action is accordingly transferred to the Southern District of Florida for consolidation with the consolidated action captioned *In re Lakeview Loan Servicing Data Breach Litigation*, Case No. 1:22-cv-20955-DPG (S.D. Fla.). The clerk is hereby directed to transfer the case file and close the action pending in this District.

IT IS SO ORDERED.

Dated: June 1, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE