

Joe Angelo (Bar #268542)
jangelo@gajplaw.com
Gale, Angelo, & Johnson, P.C.
2999 Douglas Blvd., Ste. 111
Roseville, CA 95661
916-290-7778
916-282-0771 fax

Attorney for Plaintiff
Theresa Goodfellow

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION**

Theresa Goodfellow,

Plaintiff,

v.

Equifax Information Services, LLC, et. al.

Defendants.

Case No.: 2:24-cv-01072-JAM-DMC

**STIPULATION FOR ENTRY OF
ORDER GRANTING LEAVE FOR
PLAINTIFF TO FILE A FIRST
AMENDED COMPLAINT**

Plaintiff Theresa Goodfellow (“Plaintiff”) and Defendants Equifax Information Services, LLC Inc.; Experian Information Solutions, Inc., TransUnion LLC, and Rocket Mortgage LLC (“Defendants”) (Plaintiff and Defendants are collectively the “Parties”), by and through their counsel of record, hereby submit this stipulation to allow Plaintiff to file a First Amended Complaint, pursuant to Federal Rule of Civil Procedure 15(a)(2).

RECITALS

1. WHEREAS, Plaintiff filed her initial Complaint against Defendants on April 10, 2024.

2. WHEREAS, Defendants filed their Answers on the following dates:

- a. Equifax Information Services, LLC: May 30, 2024
- b. Experian Information Solutions, Inc.: June 10, 2024
- c. TransUnion, LLC: July 8, 2024

d. Rocket Mortgage LLC: Responsive deadline extended to July 18th 2024

3. WHEREAS, the Parties began the informal exchange of information.

4. WHEREAS, the Parties have met and conferred regarding the filing of a First Amended Complaint.

5. WHEREAS, the Parties, pursuant to FRCP 15(a)(2), have agreed to stipulate for Plaintiff to file a First Amended Complaint within 14 days of entry of the Court's Order approving such a stipulation, should the Court approve of the Parties' agreement.

6. WHEREAS, should the Court grant the Parties' Stipulation, the Parties agree that Defendants shall Answer, Move or otherwise Respond to Plaintiff's First Amended Complaint within 30 days of Plaintiff's filing of same in order for Defendant to appropriately respond to any new claims alleged.

THEREFORE, in consideration of the foregoing, Plaintiff and Defendants, by and through their counsel of record, hereby **STIPULATE AND AGREE THAT** the Plaintiff can file a First Amended Complaint, subject to the Court's granting the Parties' stipulation.

IT IS SO STIPULATED.

DATED: July 11, 2024

Gale, Angelo, Johnson P.C.

By /s/ Joe Angelo

Joe Angelo

Attorney for Plaintiff

Theresa Goodfellow

DATED: July 12, 2024

Troutman Pepper Hamilton Sanders LLP

By /s/ Thomas Abbott (as authorized on July 12, 2024)

Thomas Abbott

Attorneys for Defendant

Experian Information Solutions, Inc.

1 DATED: July 12, 2024

Nokes & Quinn

2
3 By /s/ Thomas P. Quinn, Jr. (as authorized on
July 12, 2024)

4 Thomas P. Quinn, Jr.
5 Attorney for Defendant
6 Equifax Information Services, LLC

7 DATED: July 12, 2024

Quilling, Selander, Lownds, Winslett & Moser PC

8
9 By /s/ Kyle Pietrzak (as authorized on July 12,
2024)

10 Kyle Pietrzak
11 Attorney for Defendant
12 Trans Union, LLC

13 DATED: July 15, 2024

Spencer Fane LLP

14
15 By /s/ Jedidiah Lee Dooley (as authorized on
July 15, 2024)

16 Jedidiah Lee Dooley
17 Attorney for Defendant
18 Rocket Mortgage, LLC
19
20
21
22
23
24
25
26
27
28

Joe Angelo (Bar #268542)
jangelo@gajplaw.com
Gale, Angelo, & Johnson, P.C.
2999 Douglas Blvd., Ste. 111
Roseville, CA 95661
916-290-7778
916-282-0771 fax

Attorney for Plaintiff
Theresa Goodfellow

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

THERESA GOODFELLOW,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC,
ET. AL.

Defendants.

Case No.: 2:24-cv-01072-JAM-DMC

**ORDER GRANTING PLAINTIFF
LEAVE TO FILE A FIRST AMENDED
COMPLAINT**

Upon consideration of Plaintiff Theresa Goodfellow and Defendants Experian Information Solutions, Inc., Equifax Information Services, LLC TransUnion LLC, and Rocket Mortgage LLC's Stipulation for Entry of Order Granting Leave for Plaintiff to File a First Amended Complaint, and for good cause appearing, it is hereby **ORDERED** that:

- a) Plaintiff shall file her First Amended Complaint within **14 days** of entry of this Order;
- b) Defendant shall Answer, move, or otherwise respond to Plaintiff's First Amended Complaint within **30 days** of its filing.

IT IS SO ORDERED

Dated: July 18, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE