

1 Jeffrey B. Dubner (DC Bar No. 1013399)
2 (*pro hac vice*)
3 **DEMOCRACY FORWARD FOUNDATION**
4 P.O. Box 34553
5 Washington, DC 20043
6 Telephone: (202) 448-9090
7 Facsimile: (202) 701-1775
8 jdubner@democracyforward.org

Christopher J. Deal (DC Bar No. 990573)
CONSUMER FINANCIAL PROTECTION
BUREAU
1700 G Street, N.W.
Washington, D.C. 20552
Telephone: (202) 435-9582
Facsimile: (202) 435-7024
christopher.deal@cfpb.gov

6 *Counsel for Plaintiffs*

Counsel for Defendants

7 [Additional Counsel on Signature Page]

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 CALIFORNIA REINVESTMENT
14 COALITION, NATIONAL ASSOCIATION
15 FOR LATINO COMMUNITY ASSET
BUILDERS, DEBORAH LYNN FIELD, and
RESHONDA YOUNG,

16 Plaintiffs,

17 v.

19 ROHIT CHOPRA, Director, Consumer
20 Financial Protection Bureau, In His Official
21 Capacity,¹ and CONSUMER FINANCIAL
PROTECTION BUREAU,

22 Defendants.

Case No. 4:19-cv-02572-JSW

STIPULATION AND ~~PROPOSED~~
ORDER AS MODIFIED HEREIN

27 ¹ Under Rule 25(d) of the Federal Rules of Civil Procedure, Mr. Chopra is automatically
28 substituted as a party for former Acting Director David Uejio.

1 Consistent with Paragraph 9 of the Parties' Stipulated Settlement Agreement, which the
2 Court entered and approved on February 26, 2020 (ECF No. 53), the Parties hereby stipulate that
3 March 31, 2023 is an appropriate deadline under the agreement for issuance of the Section 1071
4 Final Rule. Accordingly, the parties request that the Court enter that deadline pursuant to Paragraph
5 9.

6 DATED: July 7, 2022

Respectfully submitted,

7 DEMOCRACY FORWARD FOUNDATION

8 /s/ Jeffrey B. Dubner

9 Jeffrey B. Dubner (DC Bar No. 1013399) (*pro hac vice*)

DEMOCRACY FORWARD FOUNDATION

10 P.O. Box 34553

Washington, DC 20043

11 Telephone: (202) 448-9090

12 Facsimile: (202) 701-1775

j dubner@democracyforward.org

13 Shana E. Scarlett (SBN 217895)

14 Benjamin J. Siegel (SBN 256260)

HAGENS BERMAN SOBOL SHAPIRO LLP

15 715 Hearst Avenue, Suite 202

Berkeley, CA 94710

16 Telephone: (510) 725-3000

17 Facsimile: (510) 725-3001

shanas@hbsslaw.com

18 bens@hbsslaw.com

19 Steve W. Berman (*pro hac vice*)

HAGENS BERMAN SOBOL SHAPIRO LLP

20 1301 Second Avenue, Suite 2000

Seattle, WA 98101

21 Telephone: (206) 623-7292

22 Facsimile: (206) 623-0594

steve@hbsslaw.com

23
24 *Counsel for Plaintiffs*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CONSUMER FINANCIAL PROTECTION BUREAU

/s/ Christopher J. Deal

Christopher J. Deal (DC Bar No. 990573)

CONSUMER FINANCIAL PROTECTION BUREAU

1700 G Street, N.W.

Washington, D.C. 20552

Telephone: (202) 435-9582

Facsimile: (202) 435-7024

christopher.deal@cfpb.gov

Counsel for Defendants

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

/s/ Jeffrey B. Dubner

JEFFREY DUBNER

~~PROPOSED~~ ORDER

1
2 Upon consideration of the parties' STIPULATION that March 31, 2023 is an appropriate
3 deadline under the Stipulated Settlement Agreement for issuance of a Notice of Proposed
4 Rulemaking for the Section 1071 Implementing Regulations, the Court hereby **APPROVES** and
5 **ENTERS** the stipulation pursuant to Paragraph 9 of the Agreement. Barring an extension of the
6 deadline consistent with the terms of the Agreement or further order of the Court, Defendants shall
7 issue a Final Rule for the Section 1071 Implementing Regulations by March 31, 2023. The Court
8 shall retain jurisdiction over this matter to oversee compliance with the parties' Agreement and to
9 resolve any disputes or motions for extensions or to modify such terms that may arise therefrom.

10 **IT IS SO ORDERED.** The parties shall continue to file status reports as necessary pursuant
11 to the terms of the Agreement.

12 Dated: July 11, _____, 2022

13
14 
15 THE HONORABLE JEFFREY S. WHITE
16 United States District Court Judge
17
18
19
20
21
22
23
24
25
26
27
28