Max Weinstein, Mass. Bar No. 600982
Email: max.weinstein@cfpb.gov
Admitted *Pro Hac Vice*
Tracy Hilmer, D.C. Bar No. 421219
Email: tracy.hilmer@cfpb.gov
Admitted *Pro Hac Vice*
CONSUMER FINANCIAL
PROTECTION BUREAU
1700 G Street, NW
Washington, DC 20552
Phone: (202) 435-9172 (Weinstein)
Phone: (202) 435-7459 (Hilmer)
Fax: (202) 435-5468

Chung H. Han, Cal. Bar No. 191757
Email: chung.han@usdoj.gov
U.S. ATTORNEY'S OFFICE
300 N. Los Angeles St., Suite 7516
Los Angeles, CA 90012
Phone: (213) 894-0474
Fax: (213) 894-7819

Attorneys for Plaintiff
Consumer Financial Protection Bureau

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

Consumer Financial Protection Bureau, *Plaintiff*, v. Experian Information Solutions, Inc., *Defendant*.	Case Number: 8:25-cv-00024-MWC-DFM **NOTICE OF *EX PARTE* APPLICATION AND PLAINTIFF'S *EX PARTE* APPLICATION FOR AN ORDER CONTINUING EXPERT, SUMMARY JUDGMENT AND OTHER CASE DEADLINES** Judge: Hon. Michelle Williams Court Fact Discovery Cutoff: Mar. 27, 2026 Pretrial Conference: Sept. 11, 2026 Trial Date: Sept. 21, 2026

PLEASE TAKE NOTICE that Plaintiff Consumer Financial Protection Bureau ("Bureau") will and hereby does apply to the Court *ex parte*, pursuant to Local Rule 7-19, for an order to continue expert, summary judgment and other case deadlines in this case as follows:

Event	**Current Deadline (Dkt. 41)**	**Requested Deadline**
Expert Disclosure (Initial)	4/3/26	5/15/2026
Expert Disclosure (Rebuttal)	4/17/26	6/5/2026
Expert Discovery Cut Off	5/1/26	6/19/2026
Last Day to Hear Motions	6/12/26	9/10/2026
Date to Complete Settlement Conference	7/3/26	10/1/2026
Meet and confer 40 days in advance of FPTC	7/31/26	10/29/2026
Trial Filings (first round) – including motions in limine (limited to 5)	8/14/26	11/12/2026
Trial Filings (second round)	8/28/26	12/3/2026
Final Pretrial Conference	9/11/26	12/8/2026
Trial	9/21/26	12/11/2026 or the Court's earliest next availability

The Bureau brings this application because, as set forth in the accompanying Declaration of Max Weinstein, the Bureau has diligently prepared this case for trial and good cause exists to continue the expert, summary judgment and other case deadlines and there would be irreparable prejudice if the current case deadlines remain. As detailed more fully in the Bureau's Proposed Motion for Continuance

of Expert Discovery and Summary Judgment Deadlines, the Bureau's expert has been retained as an expert in three federal criminal matters and a confidential arbitration, which are collectively scheduled for trial from 3/23/2026 to 5/29/2026, with only one fully uncommitted week. No fault or lack of diligence on the Bureau's part has necessitated this *Ex Parte* Application. The Bureau first sought the Defendant's agreement to extend deadlines in this case on January 20, 2026. The parties filed a joint stipulation seeking extensions of all outstanding deadlines on February 12, 2026, which the Court denied on February 13, 2026.

Under the Central District of California's local rules, a "notice of motion shall be filed with the Clerk not later than twenty-eight (28) days before the date set for hearing." L.R. 6-1. Additionally, Local Rule 7-3 requires counsel to meet and confer seven days prior to the filing of a motion. In accordance with these rules, the earliest hearing date possible for the Bureau's proposed motion to continue discovery and other case deadlines is after April 3, 2026, the day expert disclosures are presently due.

LOCAL RULE 7-19.1 CERTIFICATION

Pursuant to Local Rule 7-19.1, the Bureau orally and by e-mail advised Experian's counsel, John Vogt, Matthew Billeci, Richard J. Grabowski and Ryan Ball of Jones Day on March 6, 2026, about the substance of the motion. On March 6, 2026, Counsel for Experian advised that "Experian will not oppose the Bureau's request, provided it also includes a 45-day extension of the fact discovery deadline. Otherwise, Experian intends to oppose the request." The Bureau is not seeking a 45-day (or any) extension of the fact discovery deadline, and so anticipates that Experian intends to oppose this motion. On March 6, 2026, the Bureau advised opposing counsel that the motion would be filed later that day. The Bureau further advised opposing counsel that, based on its understanding of Judge Williams

Court's procedures, Experian will have until the end of Monday, March 9, 2026, to oppose this motion.

Dated: March 6, 2026

Respectfully submitted,
/s/ Max Weinstein

Max Weinstein, Mass. Bar No. 600982
Admitted *Pro Hac Vice*
Email: max.weinstein@cfpb.gov
CONSUMER FINANCIAL PROTECTION BUREAU
1700 G. Street, NW
Washington, DC 20552
Phone: (202) 435-9172