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*Attorneys for Defendants Wells Fargo & Co.  
and Wells Fargo Bank, N.A.*

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION  
14

15 SHAHRIAR JABBARI and KAYLEE  
16 HEFFELFINGER, on behalf of  
17 themselves and all others similarly  
18 situated,

Plaintiff,

vs.

19 WELLS FARGO & COMPANY and  
20 WELLS FARGO BANK, N.A.,

Defendants.  
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Case No. 15-CV-02159 VC

**STIPULATION AND ~~PROPOSED~~  
ORDER**

Judge: Hon. Vince Chhabria  
Ctrm.: 4

1 **STIPULATION**

2 Plaintiffs and Wells Fargo, through their respective counsel of record, hereby stipulate that:

3 1. Not later than June 22, 2018, Wells Fargo will send email notices to each current or  
4 former customer email address to which Wells Fargo has previously sent email notices in this  
5 action (“Reminder Email”).

6 2. The English language text of the Reminder Email will be as follows:

7 **Subject: Reminder — Filing a Claim in the Wells Fargo unauthorized account class  
8 action settlement.**

9 We recently sent you an email letting you know that, as part of our commitment to make things  
10 right, Wells Fargo entered into a \$142 million class action settlement fund related to the  
11 opening of unauthorized accounts. If you haven't yet submitted a claim in the settlement, you  
12 can do so at [www.WFSettlement.com](http://www.WFSettlement.com). Claims must be filed by July 7, 2018.

13 **If you have any questions about what checking, savings, credit card or line of credit  
14 accounts were opened in your name, please call 1-877-924-8697 for more  
15 information.**

16 **If you have any questions about the settlement, or have been unable to complete the  
17 claim form for any reason, please call the settlement administrator at 1-866-431-  
18 8549.**

19 Thank you for being a Wells Fargo customer.

20 3. The text of the Spanish language version of the Reminder Email will be a Spanish  
21 translation of the following:

22 **Subject: Reminder — Filing a Claim in the Wells Fargo unauthorized account class  
23 action settlement.**

24 We recently sent you an email letting you know that, as part of our commitment to make things  
25 right, Wells Fargo entered into a \$142 million class action settlement fund related to the  
26 opening of unauthorized accounts. If you haven't yet submitted a claim in the settlement, you  
27 can do so at [www.WFSettlement.com](http://www.WFSettlement.com). Claims must be filed by July 7, 2018.

28 **If you have any questions about what checking, savings, credit card or line of credit  
accounts were opened in your name, please call 1-800-869-3557 (1-800-TO-WELLS),  
press “9” for Spanish, then press “0” to speak with a banker for more information.**

**If you have any questions about the settlement, or have been unable to complete the  
claim form for any reason, please call the settlement administrator at 1-866-431-  
8549.**

Thank you for being a Wells Fargo customer.

1 4. Notwithstanding the foregoing, Wells Fargo need not send a Reminder Email to an  
2 email address if a Supplemental or Follow-Up Notice sent by Wells Fargo since March 22, 2018  
3 to the particular email address was returned as undeliverable.

4 Respectfully submitted,

5 DATED this 14th day of May, 2018.

6 KELLER ROHRBACK L.L.P.

MUNGER, TOLLES & OLSON LLP

7 By /s/ Derek W. Loeser (w/ email permission)  
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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: May 17, 2018.



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Hon. Vince Chhabria  
United States District Court  
Northern District California