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 JPMorgan Chase Bank, N.A., as successor  
 15 by merger to Chase Home Finance LLC, as  
 successor by merger to Chase Manhattan  
 16 Mortgage Corp. and Federal Home Loan Mortgage Corporation

17 **UNITED STATES DISTRICT COURT**  
 18 **DISTRICT OF NEVADA**

19 STEVEN and SYLVIA STAUFFER, on behalf of  
 20 herself and all others similarly situated,

21 Plaintiffs,

22 vs.

23 CHASE HOME FINANCE, LLC; CHASE  
 MANHATTAN MORTGAGE CORP.,  
 24 COOPER CASTLE LAW FIRM; and FEDERAL  
 HOME LOAN MORTGAGE CORP.,

25 Defendants.  
 26  
 27  
 28

CASE NO. 2:11-CV-01155-PMP-GWF

**PARTIES JOINT STATUS REPORT  
 AND STIPULATION AND  
 [PROPOSED] ORDER TO STAY ALL  
 LITIGATION AND DISCOVERY  
 PROCEEDINGS FOR 45 DAYS  
 PENDING SETTLEMENT  
 NEGOTIATIONS**

1 Defendants JPMorgan Chase Bank, N.A., as successor by merger to Chase Home Finance  
2 LLC, as successor by merger to Chase Manhattan Mortgage Corp. (“Chase”), Federal Home Loan  
3 Mortgage Corporation (“Freddie Mac”), and The Cooper Castle Law Firm (“Cooper Castle”)  
4 (collectively, “Defendants”), and Plaintiffs Steven Stauffer and Sylvia Stauffer (“Plaintiffs”)  
5 (Defendants and Plaintiffs collectively referred to as “the Parties”), hereby submit this Joint  
6 Status Report to provide the Court with an update regarding the status of these proceedings and,  
7 in particular, the Parties’ efforts toward achieving a settlement of the claims at issue therein.  
8 Further, in light of the ongoing good faith settlement discussions, the Parties hereby stipulate to  
9 and respectfully request that this Court grant a forty-five (45) day stay of all litigation and  
10 discovery proceedings herein so that the Parties may continue to focus their efforts on achieving a  
11 resolution of this matter outside of litigation. As grounds for this stipulated stay of proceedings,  
12 the Parties submit the following:

13 1. This Court entered its Scheduling Order on May 15, 2012 (the “Order”), setting a  
14 discovery cut-off deadline of December 31, 2012.

15 2. Since that time, the Parties have each served their initial disclosures pursuant to  
16 Fed. R. Civ. P. 26(a)(1), and Plaintiffs have propounded interrogatories and requests for  
17 production of documents upon each of the Defendants.

18 3. The Parties have and continue to work in good faith to make reasonable  
19 accommodations to their respective obligations under the Order. However, the Parties are  
20 currently engaged in good faith settlement negotiations which may result in dismissal of all  
21 claims asserted herein. Accordingly, on October 16, 2012, the Parties met and conferred  
22 regarding the timing of their respective obligations under the Order and agreed to extend the  
23 deadlines to respond to their written discovery requests and seek a forty-five (45) day stay of all  
24 pre-trial dates and deadlines while settlement discussions continue.

25 4. In light of the ongoing settlement negotiations, the Parties believe that good cause  
26 exists to grant a forty-five (45) day stay of all proceedings herein. This request is not made for  
27 the purposes of delay. Instead, the Parties agree and acknowledge that a temporary stay of all  
28 proceedings herein will serve the interests of judicial economy and may allow the Parties to

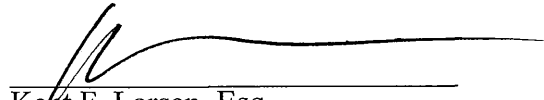
1 resolve this lawsuit without incurring unnecessary additional fees and costs. *See, e.g.,*  
2 *Mediterranean Enterprises, Inc. v. Ssangyong Corp.*, 708 F.2d 1458, 1465 (9th Cir. 1983)  
3 (temporary stay of proceedings applicable to preserve judicial efficiency and fairness).

4 5. Accordingly, the Parties respectfully request that this Court grant the Parties a stay  
5 of litigation and discovery proceedings in this action for forty-five (45) days from the date the  
6 Court enters its order approving this stipulation.

7  
8 DATED this 29 day of October, 2012.

DATED this \_\_\_\_\_ day of October, 2012.

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24 Attorneys for Defendants  
25 JPMorgan Chase Bank, N.A., as successor  
26 by merger to Chase Home Finance LLC, as  
27 successor by merger to Chase Manhattan  
28 Mortgage Corp., and Federal National  
Mortgage Corporation

DATED this \_\_\_\_\_ day of October, 2012

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LLP

24 See attached  
25 Josh Cole Aiklen, Esq.  
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27 Mark J. Brown, Esq.  
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Attorneys for Plaintiffs

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23 DATED this 26 day of October, 2012.

24 LEWIS BRISBOIS BISGAARD & SMITH  
25 LLP

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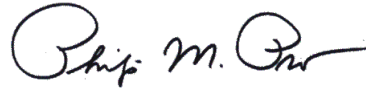
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IT IS SO ORDERED:



PHILIP M. PRO, U.S. DISTRICT JUDGE

DATED: \_ October 29, 2012. \_\_\_\_\_