

REAL ESTATE LAW GROUP LLP
JASON L. HOFFMAN (Bar No. 179924)
3455 American River Drive, Suite C
Sacramento, California 95864
Telephone: (916) 484-2600
Facsimile: (916) 484-2601
jhoffman@relglaw.com

Attorneys for EDF REsource Capital, Inc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
(FRESNO DIVISION)

WELLS FARGO BANK, NATIONAL
ASSOCIATION, successor in interest
by consolidation to Placer Sierra Bank,

Plaintiff

v.

SHREE BALAJI HOSPITALITY, LP,
a California Limited Partnership;
BALWANTSINH DOLATSINH
THAKOR, an individual; LABATEN
BALWANTSINH THAKOR, an
individual; EDF RESOURCE CAPITAL,
INC., a California corporation; U.S.
SMALL BUSINESS ADMINISTRATION,
a government entity; CITY OF
OAKDALE, a government entity; and
DOES 1 through 50, inclusive,

Defendants

Case No. 1:10-cv-1150 AWI-DLB

**STIPULATION FOR EXTENSION OF
TIME FOR EDF RESOURCE CAPITAL,
INC. TO RESPOND TO COMPLAINT;
ORDER**

1 Defendant EDF REsource Capital, Inc. (“**REsource**”), and Plaintiff Wells Fargo Bank,
2 National Association (“**Plaintiff**”), by and through their respective counsel, stipulate to extend
3 the time for REsource to respond to the Complaint which was removed to the United States
4 District Court on June 24, 2010, (Docket No. 1) as follows:

5
6 1. Plaintiff filed a Complaint in Stanislaus County Superior Court seeking, among
7 other things, to foreclose the interest in certain real property held by the United States of
8 America, Small Business Administration.

9 2. Plaintiff caused the Complaint to be served upon REsource on June 15, 2010, and
10 the United States removed the case to United States District Court on June 24, 2010. Under Rule
11 81(c)(2)(C) of the Federal Rules of Civil Procedure, the United States is required to file a
12 response to the complaint within 7 days after the notice of removal is filed or 21 days after
13 service of the initial pleading.

14 3. A scheduling conference has been set for September 21, 2010.

15 4. REsource’s counsel is currently in the process of reviewing records and preparing
16 a response.

17 Based upon the above, the parties stipulate that REsource’s time to respond to the
18 Complaint shall be extended up to and including August 16, 2010. The parties request the Court
19 endorse this stipulation by way of formal order.

20 Respectfully submitted,

21
22 Dated: July 13, 2010

REAL ESTATE LAW GROUP LLP

23 /s/ Jason L. Hoffman

24 _____
25 BY: JASON L. HOFFMAN
26 Attorneys for EDF REsource Capital, Inc.
27
28

1 Dated: July 13, 2010

COLEMAN & HOROWITT, LLP

2 /s/ Kurt V. Jaenike [as authorized July 12, 2010]

3
4 BY: KURT V. JAENIKE
Attorneys for Plaintiff, Wells Fargo Bank, National
5 Association

6 **ORDER**

7
8 IT IS SO ORDERED that REsource's time to respond to the Complaint is extended to August
9 16, 2010.

10 IT IS SO ORDERED.

11 Dated: July 13, 2010

12 /s/ Dennis L. Beck
13 UNITED STATES MAGISTRATE JUDGE