1 2	United States Attorney		
3	2500 Tulare Street, Suite 4401 Fresno, California 93721 Telephone: (559) 497-4000		
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6	Attorneys for the United States of America		
7			
8	IN THE UNITED STATES DISTRICT COURT		
9	FOR THE EASTERN DISTRICT OF CALIFORNIA		
10			
11	WELLS FARGO BANK, NATIONAL ) Case No. 1:10-cv-1150 AWI/DLB ASSOCIATION, successor in interest ) by consolidation to Placer Sierra Bank, )		
12	Plaintiff, ) STIPULATION FOR EXTENSION OF		
13 14	V. TIME FOR THE UNITED STATES OF AMERICA TO RESPOND TO		
15	SHREE BALAJI HOSPITALITY, LP, ) COMPLAINT; ORDER   a California Limited Partnership; )		
16	BALWANTSINH DOLATSINH ) THAKOR, an individual; LABATEN )		
17	BALWANTSINH THAKOR, an ) individual; EDF RESOURCE CAPITAL, ) INC., a California corporation; U.S. )		
18	SMALL BUSINESS ADMINISTRATION, ) a government entity; CITY OF		
19	OAKDALE, a government entity; and ) DOES 1 through 50, inclusive, )		
20	Defendants.		
21			
22	Defendant United States of America ("United States") and Plaintiff Wells Fargo Bank,		
23	National Association ("Plaintiff"), by and through their respective counsel, stipulate to extend the		
24	time for the United States to respond to the Complaint which was removed to the United States		
25	District Court on June 24, 2010, (Docket No. 1) as follows:		
26	1. Plaintiff filed a Complaint in Stanislaus County Superior Court seeking, among other		
27	things, to foreclose the interest in certain real property held by the United States of America, Small		
28	Business Administration.		
	Stimulation for Extension of Time for the United States of America		

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1	2. Plaintiff caused the Complaint to be served upon the United States on June 15, 2010,		
2	and the United States removed the case to United States District Court on June 24, 2010. Under		
3	Rule 81(c)(2)(C) of the Federal Rules of Civil Procedure, the United States is required to file a		
4	response to the complaint within 7 days after the notice of removal is filed. A scheduling conference		
5	has been set for September 21, 2010.		
6	3. Government counsel is currently in the process of reviewing records and preparing a		
7	response.		
8	Based upon the above, the parties stipulate that the United States' time to respond to the		
9	Complaint shall be extended up to and including August 16, 2010. The parties request the Court		
10	endorse this stipulation by way of formal order.		
11		Respectfully submitted,	
12	Dated: June 29, 2010	BENJAMIN B. WAGNER United States Attorney	
13		Office States Attorney	
14		By: <u>/s/ Jeffrey J. Lodge</u> JEFFREY J. LODGE	
15	Dated: June 29, 2010	Assistant U.S. Attorney	
16		COLEMAN & HOROWITT, LLP	
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18		By: <u>/s/ Kurt V. Jaenike</u> (as authorized 6/29/10) KURT V. JAENIKE	
19		Attorneys for Plaintiff, Wells Fargo Bank, National	
20		Association	
21	ORDER		
22	IT IS SO ORDERED that the United States of America's time to respond to the Complaint is		
23	extended to August 16, 2010.		
24	IT IS SO ORDERED.		
25	Dated: <u>June 30, 2010</u>	/s/ Dennis L. Beck	
26		UNITED STATES MAGISTRATE JUDGE	
27			
28			
	Stipulation for Extension of Time for the United States of Americ to Respond to Complaint; [Proposed Order]	<sup>ca</sup> 2	