

1 PARKER IBRAHIM & BERG LLP
 2 BRYANT S. DELGADILLO (CA Bar No. 208361)
 3 Bryant.Delgadillo@piblaw.com
 4 JONATHAN C. BOND (CA Bar No. 280266)
 5 Jonathan.Bond@piblaw.com
 6 695 Town Center Drive, 16th Floor
 7 Costa Mesa, California 92626
 8 Tel: (714) 361-9550
 9 Fax: (714) 784-4190

FILED

MAY 18 2018

CLERK, U.S. DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA
 BY _____
 DEPUTY CLERK

7 Attorneys for Defendant
 8 JPMORGAN CHASE BANK, N.A. (erroneously sued as
 9 "JP MORGAN CHASE BANK, N.A., Inc.")

10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

12 SAMIR IBRAHIM MARCOSS,

13 Plaintiff,

14 v.

15 JPMORGAN CHASE BANK, N.A.
 16 (erroneously sued as "JP MORGAN
 17 CHASE BANK, N.A., Inc."); and DOES
 18 1 THROUGH 20, inclusive,

19 Defendants.

CASE NO: 1:18-CV-00489-DAD-EPG

JOINT EX PARTE STIPULATION
 AND ORDER TO EXTEND TIME
 FOR DEFENDANT TO RESPONSE
 TO THE COMPLAINT; ORDER

Action Filed: February 9, 2018
 Removed: April 9, 2018

Response Due: May 14, 2018
 New Proposed Date: June 15, 2018

([Proposed] Order Contained Herein)

20 TO THE HONORABLE COURT:

21 IT IS HEREBY STIPULATED by and between defendant JPMORGAN
 22 CHASE BANK, N.A. (ERRONEOUSLY SUED AS "JP MORGAN CHASE BANK,
 23 N.A., INC.") ("Chase") and plaintiff Samir Ibrahim Marcoss ("Marcoss") by any
 24 between their respective counsel as follows:
 25

26 1. WHEREAS, on February 9, 2018 this action was filed in the Superior
 27 Court of California – County of Fresno.

28 2. WHEREAS, on March 9, 2018 the summons and complaint were served

1 on Chase.

2 3. WHEREAS, on April 9, 2018 Chase caused this action to be removed to
3 the United States District Court for the Eastern District of California where this matter
4 as assigned Case No. 1:18-at-00266.

5 4. WHEREAS, Chase's response to the complaint would ordinarily be due
6 on or before April 16, 2018.

7 5. WHEREAS, Chase and Marcoss mutually desire to attempt to resolve
8 this matter prior to the effort and expense of formally responding to the Complaint.

9 6. WHEREAS, on April 9, 2018 Chase and Marcoss, via counsel, agreed to
10 an extension/enlargement of the time to respond to the complaint by twenty-eight (28)
11 days pursuant to Eastern District of California Local Rule 144 through and including
12 May 14, 2018 (Dkt. No. 4).

13 7. WHEREAS, on April 10, 2018 the Court set the Mandatory Scheduling
14 Conference ("MSC") for July 19, 2018 ("MSC Date").

15 8. WHEREAS, Chase and Marcoss are continuing their dialogue regarding
16 possible settlement.

17 9. WHEREAS, Chase and Marcoss have agreed to continue said settlement
18 discussions through and including June 15, 2018 and mutually desire that Chase's
19 response to the Complaint be due on or before June 15, 2018, which date is before the
20 MSC Date, pursuant to Eastern District of California Local Rule 144.

21 10. WHEREAS, both Chase and Marcoss jointly apply to the Court on an ex
22 parte basis for an Order setting Chase's response to the Complaint as June 15, 2018.

23 / / /

24 / / /

25 / / /

26 / / /

27 / / /

28 / / /

1 NOW THEREFORE, IT HEREBY STIPULATED AND AGREED BY AND
2 BETWEEN THE UNDERSIGNED COUNSEL FOR THE PARTIES HERETO:

3 Chase and Marcoss stipulate to extend Chase's time to respond to the complaint
4 from May 14, 2018 to June 15, 2018.

5 IT IS SO STIPULATED.

6
7 DATED: May 14, 2018

PARKER IBRAHIM & BERG LLP

8
9 By: /s/ Jonathan C. Bond
10 BRYANT S. DELGADILLO
11 JONATHAN C. BOND
12 Attorneys for Defendant
13 JPMORGAN CHASE BANK, N.A.
(erroneously sued as "JP Morgan Chase
Bank, N.A., Inc.")

14 DATED May 14, 2018

THE FOLLAND LAW GROUP

15
16 By: /s/ Brian N. Folland (auth. 5/14/18)
17 BRIAN N. FOLLAND
18 Attorney for Plaintiff
19 SAMIR IBRAHIM MARCOSS
20
21
22
23
24
25
26
27
28

ORDER

Based on the above stipulation of the parties, and good cause appearing,
Chase's time to respond to the complaint is extended from May 14, 2018 to June 15,
2018.

DATED: 5/18/18



ERICA P. GROSJEAN
UNITED STATES MAGISTRATE JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28