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11 Attorney for Plaintiff David Smith

12 **UNITED STATES DISTRICT COURT**  
 13 **EASTERN DISTRICT OF CALIFORNIA**

14 DAVID SMITH,  
 15 Plaintiff,  
 16 vs.  
 17 CHASE MORTGAGE CREDIT GROUP,  
 18 LA JOLLA LENDING & REAL ESTATE,  
 19 INC., PAUL BAKHTIAR, POOYAN  
 20 BAKHTIAR, WELLS FARGO, N.A.,  
 21 WEST AMERICAN ESCROW, INC., and  
 22 Does 1 through 10 inclusive,  
 23 Defendants.

Case No.: 2:08-cv-01049-LKK-KJM

24 **STIPULATION AND ORDER TO**  
 25 **PARTICIPATE IN VOLUNTARY**  
 26 **DISPUTE RESOLUTION PROGRAM**

27 Dept.: Courtroom 4  
 28 Judge: Honorable Lawrence K. Karlton

Complaint filed: April 14, 2008  
 Trial Date: March 16, 2010

29 AND RELATED COUNTERCLAIMS  
 30

31 **TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

32 Pursuant to United States District Court, Eastern District of California's Local  
 33 Rule 16-271, Plaintiff David Smith, Defendants Wells Fargo Bank, N.A. (sued herein as  
 34 Wells Fargo, N.A.), Chase Mortgage Credit Group, Inc., La Jolla Lending & Real Estate,  
 35 Inc., Paul Bakhtiar aka Pooyan Bakhtiar, and West American Escrow, Inc., stipulate and  
 36 request that this matter be ordered to the Court's Voluntary Dispute Resolution  
 37 Program, to be completed by **April 30, 2009**, and that the Court's VDRP Administrator  
 38 provide the parties with a list of three (3) potential Neutrals from the Court's Panel of

1 Neutrals.

2 Dated: 2/2/09

3 By: /s/

4 Karen M. Goodman (SBN: 117423),  
5 Summer D. Haro (SBN: 245482), or  
6 Craig Henderson (SBN: 194953)  
7 GOODMAN & ASSOCIATES,  
8 Attorneys for Plaintiff  
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14 Dated: 2/2/09

15 By: /s/

16 Michael J. Steiner (SBN: 112079) or  
17 Joshua E. Whitehair (SBN: 244900)  
18 SEVERSON & WERSON,  
19 Attorneys for Defendant  
20 WELLS FARGO BANK, N.A.  
21 (erroneously sued herein as WELLS  
22 FARGO, N.A.)  
23 SEVERSON & WERSON, A  
24 Professional Corporation,  
25 One Embarcadero Center, Suite 2600  
26 San Francisco, CA 94111  
27 Phone: (415) 398-3344

28 Dated: 1/17/09

By: /s/

Dale F. Hardeman (SBN 190167)  
Attorney for Defendants  
CHASE MORTGAGE CREDIT GROUP,  
INC., LA JOLLA LENDING & REAL  
ESTATE, INC., POOYAN BAKHTIAR  
aka PAUL BAKHTIAR, and WEST  
AMERICAN ESCROW,  
7700 Irvine Center Drive, Suite 800  
Irvine, CA 92618  
Phone: (949) 753-2854

**IT IS SO ORDERED**

Dated: February 10, 2009.

  
LAWRENCE K. KARLTON  
SENIOR JUDGE  
UNITED STATES DISTRICT COURT