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8	UNITED STATES DISTRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO	
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11	STEVE LOPEZ AND CARMEN LOPEZ,	Case No. 2:09-CV-01510-JAM-DAD
12	Plaintiffs,	[Assigned to the Hon. John A. Mendez, Ctrm.
13	vs.	6, for all purposes]
14	WACHOVIA MORTGAGE, WORLD	STIPULATION AND ORDER
15	SAVINGS BANK, COMSTOCK	EXTENDING DISCOVERY CUTOFF FOR THE TAKING OF PLAINTIFFS'
16	MORTGAGE, DAVID MENDOZA, ADRIAN DEL RIO, and DOES 1-20	DEPOSITIONS
17	inclusive,	
18	Defendants.	
19		
20	TO THE HONORABLE DISTRICT COURT:	
21	<u>RECITALS</u>	
22	A. Plaintiffs Steve Lopez and Carmen Lopez through their counsel, Michael J.M.	
23	Brook of Lanahan & Reilley, LLP, defendant Wachovia Mortgage, FSB, formerly known as	
24	World Savings Bank, FSB, and sued here as "Wachovia Mortgage and World Savings Bank"	
25	("Wachovia"), through its counsel, Jeremy E. Shulman of Anglin, Flewelling, Rasmussen,	
26	Campbell & Trytten, LLP, and defendants Comst	
27	Rio, through their counsel, Glenn W. Peterson of Millstone, Peterson & Watts, LLP, hereby	
28		
	J:\Docs\UN377\Stip and Proposed Order re_ Plaintiffs' Depositions-214896.doc	2:09-CV-01510-JAM-DAD STIPULATION AND [PROPOSED] ORDER EXTENDING DISCOVERY CUTOFF

1	submit this joint request for an order extending the discovery cutoff solely for the purpose of	
2	conducting plaintiffs' depositions on August 25 and 26, 2010.	
3	B. Pursuant to the Court's order of May 4, 2010, the current discovery cutoff is	
4	August 6, 2010.	
5	C. Defendants have noticed the depositions of both plaintiffs' for consecutive days or	
6	August 5, 2010 and August 6, 2010.	
7	D. Due to the unavailability of plaintiffs' counsel on August 5 and 6, the parties have	
8	agreed to conduct the depositions of plaintiffs on August 25 and 26, 2010.	
9	E. Accordingly, the parties respectfully request an order extending the discovery	
10	cutoff to allow for plaintiffs' depositions to be taken on the agreed upon dates of August 25 and	
11	26, 2010.	
12	STIPULATION	
13	It is therefore STIPULATED:	
14	1. That all parties consent to a Court Order resetting the discovery cutoff to a date	
15	after August 26, 2010.	
16	LANAHAN & REILLEY, LLP	
17	Dated: August 4, 2010 By: /s/Michael J.M. Brook	
18	Michael J.M. Brook rnbrook@lanahan.com	
19	Attorneys for Plaintiffs, Steve Lopez and Carmen Lopez	
20	Dated: August 4, 2010 ANGLIN, FLEWELLING, RASMUSSEN,	
21	CAMPBELL & TRYTTEN LLP	
22	By: /s/Jeremy E. Shulman	
23	Jeremy E. Shulman jshulman@afrct.com	
24	Attorneys for Defendant, Wachovia Mortgage, FSB, formerly known as	
25	World Savings Bank, FSB, and sued here as "Wachovia Mortgage and World Savings Bank"	
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	7/09_CV_01510_1AM_DAD	

1	Dated: August 4, 2010 MILLSTONE, PETERSON & WATTS, LLP	
2	By: /s/Glenn W. Peterson	
3	By: /s/Glenn W. Peterson Glenn W. Peterson gpeterson@mpwlaw.net	
4 5	Attorneys for Defendants, Comstock Mortgage, David Mendoza and Adrian Del Rio	
6	ORDER ON STIPULATION	
7	Having read and filed the foregoing Stipulation, and good cause appearing:	
	IT IS ORDERED:	
8	1. That present discovery cutoff is extended to September 3, 2010 to allow	
10	defendants to take the depositions of plaintiffs Steve Lopez and Carmen Lopez on August 25 and	
11	26, 2010.	
12		
13	Dated: August 5, 2010 /s/ John A. Mendez HON. JOHN A. MENDEZ	
14	UNITED STATES DISTRICT JUDGE	
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2:09-CV-01510-JAM-DAD STIPULATION AND [PROPOSED] ORDER EXTENDING DISCOVERY CUTOFF

1	CERTIFICATE OF SERVICE	
2	I, the undersigned, declare that I am over the age of 18 and am not a party	
3	to this action. I am employed in the city of Pasadena, California; my business	
4	address is Anglin, Flewelling, Rasmussen, Campbell & Trytten LLP, 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459.	
5	Robles Wende, Buile 600, Lasadena, Camornia 71101 2437.	
6	On the date below I served a copy of the following document(s):	
7	STIPULATION AND [PROPOSED] ORDER EXTENDING DISCOVERY CUTOFF FOR THE TAKING OF PLAINTIFFS' DEPOSITIONS	
8		
9	on all interested parties in said case as follows:	
10	Served Electronically via Court's CM/ECF System:	
11	Served Electronicany via Court's Civi/ECF System.	
12	Attaurant four Divintiffs	
13	Attorney for Plaintiffs Attorney for Defendants Comstock Mortgage, David Mendoza and	
14	Michael J.M. Brook, Esq. Adrian Del Rio	
15	Lanahan & Reilley, LLP	
16	600 Bicentenial Drive, Suite 300 Glenn W. Peterson, Esq. Septe Page CA 05403 MILLSTONE PETERSON & WATTS, LLP	
17	Santa Rosa, CA 95403 MILLSTONE PETERSON & WATTS, LLP Email: mbrook@lanahan.com 2267 Lava Ridge Court, Suite 210	
18	Tel: (707) 524-4200 Roseville, California 95661	
19	Fax: (707) 523-4610 Email: <u>gpeterson@mpwlaw.net</u>	
20	Tel: (916) 780-8222 Fax: (916) 780-8775	
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	I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in	
24	the office of a member of the Bar of this Court at whose direction the service was	
25	made. This declaration is executed in Pasadena, California, on August 5, 2010.	
26		
27	Wendy Mutum	
28	(Type or Print Name) (Signature of Declarant)	
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