

1 **Stuart B. Wolfe (SBN 156471)**
 2 **Natilee S. Riedman (SBN 257871)**
 3 **nsriedman@wolfewyman.com**
 4 **2175 N. California Blvd., Suite 415**
 5 **Walnut Creek, California 94596-3579**
 6 **Telephone: (925) 280-0004**
 7 **Facsimile: (925) 280-0005**

8 **Attorneys for Defendant**
 9 **FIRST FRANKLIN FINANCIAL**
 10 **CORPORATION**

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

13 KIMBERLY THOMAS,
 14 Plaintiff,
 15 v.

Case No. 2:09-CV-01939-JAM-KJM

**STIPULATION TO EXTEND TIME TO
 RESPOND TO PLAINTIFF'S
 COMPLAINT**

[L.R. 6-144]

16 WELLS FARGO BANK, N.A. dba
 17 AMERICA'S SERVICING CO., FIRST
 18 FRANKLIN, a division of NATION CITY
 19 BANK, NDEX WEST LLC, MORTGAGE
 ELECTRONIC REGISTRATION SYSTEMS,
 INC., DRAKE MORTGAGE, MICHAEL D.
 DRAKE and DOES 1-20 inclusive,
 Defendants.

20 TO ALL PARTIES HEREIN AND TO THEIR RESPECTIVE ATTORNEYS OF
 21 RECORD:

22 This Stipulation is made pursuant to Local Rule 6-144 and is made by and between Plaintiff
 23 KIMBERLY THOMAS (hereinafter "Plaintiff") and Defendant FIRST FRANKLIN FINANCIAL
 24 CORPORATION (erroneously sued as "First Franklin, a division of Nation City Bank")
 25 (hereinafter "FFFC"). Plaintiff and FFFC, by and through their respective counsel of record
 26 herein, agree and stipulate as follows:

27 A. On or about August 13, 2009 FFFC requested of Plaintiff an extension of time to
 28 respond to the Complaint until and including September 18, 2009.



1 B. On or about August 13, 2009, Plaintiff's counsel agreed to extend FFFC's time to
2 respond to the Complaint until and including September 18, 2009.

3 C. No previous extensions of time have been given to FFFC in this matter.

4 D. This Stipulation does not alter the date of any event or any deadline already fixed by
5 the Court.

6 WHEREFORE, the parties to this action agree and stipulate that FFFC has until and
7 including September 18, 2009 to respond to Plaintiff's Complaint.

8 DATED: August 14, 2009

WOLFE & WYMAN LLP

9

10

11

By: _____

12

STUART B. WOLFE
NATILEE S. RIEDMAN

13

Attorneys for Defendant
**FIRST FRANKLIN FINANCIAL
CORPORATION**

14

15

DATED: _____, 2009

LAW OFFICES OF JONATHAN G. STEIN

16

17

By: _____

18

PHILIP E. CAREY

19

Attorney for Plaintiff
KIMBERLY THOMAS

20

///

21

///

22

///

23

///

24

///

25

///

26

///

27

///

28

///

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

ORDER ON STIPULATION

The Court having reviewed the stipulation of the parties, and good cause appearing therefore, ORDERS that defendant First Franklin Financial Corporation shall have including and until September 18, 2009 to respond to Plaintiff's Complaint in this matter.

IT IS SO ORDERED.

Dated: August 19, 2009

/s/ John A. Mendez
UNITED STATES DISTRICT JUDGE

W
WOLFE & WYMAN LLP
Attorneys & Counselors At Law