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6 Attorneys for Defendants
7 BANK OF AMERICA, N.A., BAC HOME LOANS SERVICING, LP,
8 and COUNTRYWIDE HOME LOANS, INC.

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12 Attorney for Plaintiff
13 GENNADY SHAPIRO

15 **UNITED STATES DISTRICT COURT**

16 **EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

18 GENNADY SHAPIRO

19 Plaintiff,

20 vs.

21 BANK OF AMERICA, N.A.; PRLAP, INC.;
22 RECONTRUST COMPANY, N.A.; BAC
23 HOME LOANS SERVICING, LP; VERDUGO
24 TRUSTEE SERVICE CORPORATION;
25 CITIBANK, N.A.; and DOES 1 through 20,
26 inclusive,

25 Defendants.

Case No. 2:11-cv-00576-JAM-CMK

**JOINT STIPULATION EXTENDING
DEFENDANTS' TIME TO FILE A
RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT PURSUANT
TO L.R. 143 AND 144**

Complaint Filed: March 1, 2011
Trial Date: Not Yet Assigned
Judge: Hon. Craig M. Kellison

JOINT STIPULATION

1
2 Defendants Bank of America, N.A., PRLAP, Inc., Recontrust Company, N.A., and BAC
3 Home Loans Servicing, LP (collectively “Defendants”) and Plaintiff Gennady Shapiro
4 (“Plaintiff”) by and through their counsel of record, hereby stipulate and agree as follows:

- 5 1. Plaintiff filed her Complaint in this action on March 1, 2011;
6 2. Defendants received notice of this action on March 23, 2011;
7 3. Defendants’ deadline to file a responsive pleading to Plaintiff’s Complaint has not
8 been set by Order of this Court;
9 4. Per Federal Rules of Civil Procedure, Rule 12, Defendants’ deadline to file a
10 responsive pleading to Plaintiff’s Complaint is April 13, 2011;
11 5. In order to explore settlement negotiations, reduce cost of litigation for both parties,
12 and unburden the Court’s docket, Defendants, by and through their undersigned counsel, request
13 and Plaintiff agrees on April 7, 2011 that Defendants’ deadline to file a responsive pleading to
14 Plaintiff’s Complaint shall be extended to May 31, 2011;
15 6. This is the first extension sought in this action by either party;
16 7. The stipulated extension to file a responsive pleading will not result in prejudice to
17 any party and its impact on judicial proceedings is not expected to be significant.

18 Nothing in this stipulation shall constitute a waiver of any arguments or defenses that
19 Defendants or Plaintiff may wish to assert in their pleadings, all of which are expressly reserved.

20 **IT IS SO ORDERED.**

21 Date: 4/12/2011

22 /s/ John A. Mendez

U.S. DISTRICT COURT JUDGE

23 Dated: April 12, 2011

LAW OFFICES OF HOLLY S. BURGESS
Holly S. Burgess

24 By: /s/ Holly S. Burgess

Holly S. Burgess

25 Attorneys for Plaintiff
26 GENNADY SHAPIRO
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Dated: April 12, 2011

BRYAN CAVE LLP

Deborah A. Goldfarb

Clayton Gaddis

By: /s/ Clayton Gaddis

Clayton Gaddis

Attorneys for Defendants

BANK OF AMERICA, N.A., RECONTRUST
COMPANY, N.A., AND BAC HOME LOANS
SERVICING, LP,