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12 Attorneys for Plaintiffs
VIOLETA B. & EPIFANIO A. DEL VALLE

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15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**
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18 VIOLETA B. & EPIFANIO A. DEL VALLE,
19 individuals,

20 Plaintiffs,

21 vs.

22 BANK OF AMERICA, N.A., a Corporation;
DOES 1 through 50, inclusive,

23 Defendants.
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Case No. 2:11-cv-01215-MCE-KJN

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

Complaint Filed: April 1, 2011
Trial Date: Not Yet Assigned
Judge: Hon. Morrison C.
England, Jr.

JOINT STIPULATION

1
2 Defendant Bank of America, N.A. (“Defendant”) and Plaintiffs Violeta B. and Epifanio A.
3 Del Valle (“Plaintiffs”) by and through their counsel of record, hereby stipulate and agree as
4 follows:

- 5 1. Plaintiffs filed their Complaint in this action on April 1, 2011;
- 6 2. Defendants received notice of this action on April 5, 2011;
- 7 3. Defendants removed this action to the United States District Court, Eastern District on
8 May 5, 2011;
- 9 4. Defendants’ deadline to file a responsive pleading to Plaintiffs’ Complaint has not
10 been set by Order of this Court;
- 11 5. Per Federal Rules of Civil Procedure, Defendants’ original deadline to file a
12 responsive pleading to Plaintiffs’ Complaint was May 12, 2011;
- 13 6. In May 2011, the parties stipulated, and the Court entered an order, to extend
14 Defendant’s deadline to file a responsive pleading to Plaintiffs’ Complaint to June 23, 2011,
- 15 7. In order to continue the exploration of settlement negotiations, reduce cost of
16 litigation for both parties, and unburden the Court’s docket, Defendant, by and through its
17 undersigned counsel, requests and Plaintiffs agree, by and through their undersigned counsel, on
18 May 14, 2011, that Defendant’s deadline to file a responsive pleading to Plaintiffs’ Complaint
19 shall be extended to July 29, 2011;
- 20 8. This is the second extension sought in this action;
- 21 9. The stipulated extension to file a responsive pleading will not result in prejudice to
22 any party and its impact on judicial proceedings is not expected to be significant.

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1 Nothing in this stipulation shall constitute a waiver of any arguments or defenses that
2 Defendant or Plaintiffs may wish to assert in their pleadings, all of which are expressly reserved.

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4 Dated: June 20, 2011

LAW OFFICES OF KENNETH R. GRAHAM
Kenneth Graham

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6 By: /s/Kenneth R. Graham
Kenneth R. Graham
7 Attorneys for Plaintiffs
8 VIOLETA B. & EPIFANIO A. DEL VALLE


9 Dated: June 20, 2011

BRYAN CAVE LLP
Andrea M. Hicks
Michael J. Peng

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11 By: /s/ Andrea M. Hicks
12 Andrea M. Hicks
13 Attorneys for Defendant
14 BANK OF AMERICA, N.A.

15 IT IS SO ORDERED.

16 Date: June 20, 2011

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20 MORRISON C. ENGLAND, JR.
21 UNITED STATES DISTRICT JUDGE
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