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*Attorneys for Plaintiffs and the Class*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

**SHEILA GOODEN**, an individual; and  
**MICHELLE HALL**, an individual,

Plaintiffs,

v.

**SUNTRUST MORTGAGE, INC.**,  
a Virginia corporation,

Defendant.

Case No. 2:11-cv-02595-JAM-DAD

**STIPULATION AND REQUEST AND  
ORDER IN LIGHT OF SETTLEMENT**

**STIPULATION AND REQUEST; [PROPOSED] ORDER;** Case No. 2:11-cv-02595-JAM-DAD

1 **STIPULATION AND REQUEST**

2 Plaintiffs SHEILA GOODEN and MICHELLE HALL (“Plaintiffs”), and Defendant  
3 SUNTRUST MORTGAGE, INC., (“SunTrust”) have previously notified the Court that the  
4 parties have reached a settlement in principle.

5 On September 15, 2014, the Court extended the stay of this case, asking that the parties,  
6 by September 23, 2014, submit a statement informing the Court that the parties have successfully  
7 completed settlement, requesting a further stay, or proposed a schedule to proceed with litigation.  
8 *See* Dkt. No. 131.

9 The parties hereby notify the Court that they are continuing to negotiate to finalize the  
10 settlement of this action. The parties are currently in the process of investigating unexpected tax  
11 consequences of the tentatively reached agreement to resolve the dispute and continue to make  
12 progress toward a finalized settlement to wholly resolve the litigation.

13 While the parties were hopeful that the settlement would be finalized by September 30,  
14 2014, they are requesting a thirty-day stay of the litigation, up to and including October 30, 2014  
15 to finalize and resolve the litigation. The parties are hopeful that no further requests for  
16 extensions of the stay will be necessary.

17 The parties therefore respectfully stipulate to and respectfully request that the Court enter  
18 an additional stay until October 30, 2014.

19 **IT IS SO STIPULATED.**

20 Respectfully Submitted,

21 Dated: September 23, 2014

**COTCHETT, PITRE & McCARTHY, LLP**

22  
23 By: /s/ Eric J. Buescher  
JUSTIN T. BERGER  
ERIC J. BUESCHER

24 *Attorneys for Plaintiffs*

25  
26 Dated: September 23, 2014

**SEVERSON & WERSON**

27 By: /s/ Philip Barilovits  
PHILIP BARILOVITS

28 *Attorneys for Defendant*

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**ORDER**

Pursuant to the stipulation and request of the parties, and for good cause shown, the Court hereby extends the stay in this case until October 30, 2014. By October 23, 2014, the parties are to submit a statement informing the Court that the parties have successfully completed settlement, requesting a further stay, or propose a schedule to proceed with litigation.

**IT IS SO ORDERED.**

Dated: 9/24/2014

/s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ