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6 Attorneys for Defendants
HOMEWARD RESIDENTIAL, INC. fka
7 AMERICAN HOME MORTGAGE SERVICING, INC.,
DEUTSCHE BANK NATIONAL TRUST COMPANY,
8 AS TRUSTEE FOR AMERIQUEST MORTGAGE
SECURITIES INC., ASSET-BACKED PASS-THROUGH
9 CERTIFICATES, SERIES 2003-7, and POWER
DEFAULT SERVICES

10
11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

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14 GABRIEL DICK,) Case No. 2:13-cv-00201-WBS-CKD
15 Plaintiff,)
16 vs.) **JOINT STIPULATION TO EXTEND**
17 AMERICAN HOME MORTGAGE) **DEPOSITION COMPLETION DEADLINE;**
18 SERVICING, INC., et al.,) **ORDER**
19 Defendants.) Honorable William B. Shubb
20) Trial Set: March 6, 2018
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1 **RECITALS**

2 Plaintiffs Gabriel Dick and Deborah Jill Dick (“Plaintiffs”) and Defendants HOMEWARD
3 RESIDENTIAL, INC. fka AMERICAN HOME MORTGAGE SERVICING, INC., DEUTSCHE
4 BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR AMERIQUEST MORTGAGE
5 SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-7, and
6 POWER DEFAULT SERVICES (together, “Defendants”) (collectively, the “Parties”), by and
7 through their respective counsel of record, and subject to the Court’s approval, hereby stipulate and
8 agree as follows:

9 WHEREAS, pursuant to FRCP 30, Defendants noticed Plaintiffs’ depositions for August 24,
10 2017, and August 29, 2017;

11 WHEREAS, the discovery cutoff deadline in this case is September 1, 2017;

12 WHEREAS, Defendants’ Motion for Judgment on the Pleadings is set to be heard on
13 October 2, 2017;

14 WHEREAS, the Parties are engaged in serious and substantial settlement discussions;

15 WHEREAS, the Parties desire to complete the settlement discussions and have the Motion
16 for Judgment on the Pleadings heard before taking any depositions, if necessary;

17 WHEREAS, Defendants and Plaintiffs agree that the extension of the fact discovery deadline
18 is for the deposition of Plaintiffs only, and does not extend the deadline for any other discovery,
19 would reduce costs for both Plaintiffs and Defendants and allow the Parties to further pursue
20 settlement without engaging in expensive and likely unnecessary depositions;

21 WHEREAS, the extension of the fact discovery for only the deposition of Plaintiffs is not
22 requested for purposes of delay and will not result in any prejudice;

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STIPULATION

IT IS THEREFORE STIPULATED AND AGREED, by and among Plaintiffs and Defendants, and subject to the approval of the Court, that:

- 1. The discovery cut off deadline be extended to October 31, 2017, for the limited purpose of deposing Plaintiffs, however, all other discovery deadlines remain unchanged;

DATED: August 21, 2017

Respectfully Submitted,
UNITED LAW CENTER

By: /s/ Danny Barak
Danny Barak
Attorneys for Plaintiffs

DATED: August 21, 2017

HINSHAW & CULBERTSON LLP

By: /s/ Tyler Carle
Tyler A. Carle
Attorneys for Defendants

I, Tyler Carle, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Danny Barak has concurred in this filing.

/s/ Tyler Carle

ORDER

Having reviewed the above stipulation of the Parties and good cause appearing therefore, IT IS SO ORDERED.

Dated: August 24, 2017

Carolyn K. Delaney
CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE