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7 **UNITED STATES DISTRICT COURT**

8 **EASTERN DISTRICT OF CALIFORNIA**

9
10 **CARTHEL DENNIS BORING, an individual,**

11 **Plaintiff,**

12 **v.**

13 **NATIONSTAR MORTGAGE, LLC, a limited**
14 **liability company; BANK OF AMERICA,**
15 **N.A., a national business association; and**
16 **DOES 1-50, inclusive,**

17 **Defendants.**

Case No.: 2:13-cv-01404-GEB-CMK

[Hon. Garland E. Burrell, Jr.]

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JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
DISCOVERY AND TRIAL RELATED
DEADLINES

Action Filed: July 15, 2013

Trial Date: November 3, 2015

1 Plaintiff Carthel Dennis Boring (“Plaintiff”) and Defendants Nationstar Mortgage, LLC
2 and Bank of America, N.A. (“Defendants”) (collectively Plaintiffs and Defendant may be referred
3 to as the “Parties”) hereby stipulate and agrees as follows, subject to the Court’s approval.

4 **RECITALS**

- 5 1. WHEREAS, on April 16, 2014, the trial issued a Scheduling Order in this matter:
- 6 2. WHEREAS, following, the Court’s Scheduling Order, the parties have been
7 diligently engaging in discovery, by propounding written discovery and noticing
8 the depositions of pertinent witnesses;
- 9 3. WHEREAS, following the Court’s Order, Defendant began reviewing Plaintiff for
10 a loan modification in an attempt to resolve this matter without the need for further
11 litigation and a final decision has not yet been made by Defendant;
- 12 4. WHEREAS additional time is needed to process Plaintiff’s loan modification
13 application;
- 14 5. WHEREAS the parties have not previously requested an extension of time on any
15 of the discovery or trial related deadlines
- 16 6. WHEREAS trial in this matter is currently scheduled for November 3, 2015
- 17 7. WHEREAS, in an attempt to continue pursuing settlement negotiations without the
18 need to expend exorbitant litigation expenses, the Parties wish to extend the
19 following discovery and trial related deadlines as follows:
 - 20 a. Fact discovery cutoff.....July 6, 2015
 - 21 b. Designation of experts with reports.....July 6, 2015
 - 22 c. Designation of rebuttal experts with reports.....July 20, 2015
 - 23 d. Expert discovery cutoff.....August 14, 2015
 - 24 e. Last day for hearing on dispositive motions.....August 17, 2015
 - 25 f. Final Pretrial Conference.....September 7, 2015 at 2:30
26 p.m.

STIPULATION

IT IS HEREBY STIPULATED AND AGREED TO that

1. The following discovery and trial related deadlines shall be continued as follows::
 - a. Fact discovery cutoff.....July 6, 2015
 - b. Designation of experts with reports.....July 6, 2015
 - c. Designation of rebuttal experts with reports.....July 20, 2015
 - d. Expert discovery cutoff.....August 14, 2015
 - e. Last day for hearing on dispositive motions.....August 17, 2015
 - f. Final Pretrial Conference.....September 7, 2015 at 2:30 p.m.

DATED: January 14, 2015

SEVERSON & WERSON
A Professional Corporation

By: /s/ Laszlo Ladi
Laszlo Ladi (Authorization for e-
signature given via email)

Attorneys for Defendant NATIONSTAR MORTGAGE,
LLC.

DATED: January 14, 2015

REED SMITH LLP

By: /s/ Britt Roberts
Britt Roberts (Authorization for e-
signature given via email)

Attorneys for Defendant BANK OF AMERICA, N.A.

MELLEN LAW FIRM

DATED: January 14, 2015

By: /s/ Matthew Mellen
Matthew Mellen

Attorneys for Plaintiff CARTEL DENNIS BORING

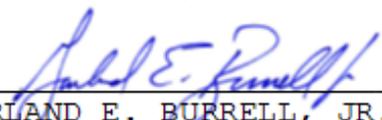
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PROPOSED ORDER

The Court, having read the above-stipulation and good cause appearing therefor, IT IS
HEREBY ORDERED THAT:

1. The following discovery and trial related deadlines shall be continued as follows:
 - a. Fact discovery cutoff.....July 6, 2015
 - b. Designation of experts with reports.....July 6, 2015
 - c. Designation of rebuttal experts with reports.....July 20, 2015
 - d. Expert discovery cutoff.....August 14, 2015
 - e. Last day for hearing on dispositive motions.....August 24, 2015
 - f. Final Pretrial Conference.....October 26, 2015 at 11:00 a.m.. A joint pretrial statement shall be filed seven days prior to the hearing.
 - g. Trial is rescheduled for December 1, 2015, at 9:00 a.m.

Dated: January 26, 2015



GARLAND E. BURRELL, JR.
Senior United States District Judge