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 2 LAW OFFICES OF ALLAN R. FRUMKIN, INC.
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5 Attorneys for Plaintiff
 6 CHRIS HARRIS

7 UNITED STATES DISTRICT COURT
 8 EASTERN DISTRICT OF CALIFORNIA

9 CHRIS HARRIS,
 10 Plaintiff.

11 vs.

12 THE SECRETARY OF HOUSING AND
 13 URBAN DEVELOPMENT OF
 WASHINGTON D.C., HIS SUCCESSORS
 14 AND ASSIGNS; THAO PHAM, an
 individual; MIGUEL A. UGARTE, an
 15 individual; MID VALLEY MORTGAGE
 SERVICES INC., a California corporation,
 16 and DOES 1 through 30,

17 Defendants.

Case No. 2:14-CV-01769-JAM-AC

STIPULATION TO EXTEND DEADLINES
 FOR FILING OF PLAINTIFF’S MOTION
 TO REMAND AND DEFENDANT’S
 RESPONSIVE PLEADING; ORDER

18
 19 **BACKGROUND**

20 1. Plaintiff CHRIS HARRIS (herein referred to as “Plaintiff”) filed his Verified
 21 Complaint against Defendant SHAUN DONOVAN as the ACTING SECRETARY OF
 22 HOUSING AND URBAN DEVELOPMENT OF WASHINGTON D.C., HIS SUCCESSORS
 23 AND ASSIGNS (herein referred to “Defendant HUD”) and others in Placer County Superior
 24 Court, California, Case No. SCV0034914.

25 2. Prior to filing an answer or other responsive pleading in the state court action,
 26 Defendant HUD filed its Notice of Removal (Docket No. 1) on July 25, 2014 to the United
 27 States District Court, Eastern District of California.

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Dated: August 12, 2014

LAW OFFICES OF ALLAN R. FRUMKIN, INC.

By: /s/ Allan R. Frumkin
Allan R. Frumkin, Esq.
Attorney for Plaintiff
CHRIS HARRIS

Dated: August 12, 2014

UNITED STATES ATTORNEY'S OFFICE

By: /s/ Gregory T. Broderick
Gregory T. Broderick, Esq.
Attorney for Defendant
SECRETARY OF HOUSING AND
URBAN DEVELOPMENT

ORDER

IT IS SO ORDERED.

Dated: 8/12/2014

/s/ John A. Mendez
United States District Court Judge

1 **PROOF OF SERVICE**

2 I am employed by LAW OFFICES OF ALLAN R. FRUMKIN, INC. in the County of Placer, State of California. I
3 am over the age of 18 and not a party to the within action. My business address 3268 Penryn Road. Ste. 100,
Loomis, CA 95650. On the signature date below, I served the document, described as:

4 **STIPULATION TO EXTEND DEADLINES FOR FILING OF PLAINTIFF’S MOTION TO REMAND
5 AND DEFENDANT’S RESPONSIVE PLEADING; ORDER**

6 on each interested party in this action, as follows:

7 Gregory T. Broderick
8 United States Attorney's Office
9 501 I Street, Suite 10-100
10 Sacramento, CA 95814
11 916-554-2780; Fax: 916-554-2900
12 Email: gregory.broderick@usdoj.gov
13 **Attorney for SECRETARY OF HOUSING AND
14 URBAN DEVELOPMENT**

15 X (VIA NOTICE OF ELECTRONIC FILING [“NEF”]) Pursuant to Local Rule 135 (FRCP 5), the document
16 will be served by the Court’s CM/ECF system via NEF and hyperlink to the document(s) upon all participants who
17 are registered CM/ECF users in this case.

18 _____(BY U.S. MAIL) I placed a true copy or original of the document(s) in a sealed envelope addressed to each
19 interested party as set forth above. I placed each such envelope, with postage thereon fully prepaid, for collection
20 and mailing at Lynes & Associates, Roseville, California. I am readily familiar with Lynes & Associates’ practice
21 for collection and processing of correspondence for mailing with the United States Postal Service. Under that
22 practice, the correspondence would be deposited in the United States Postal Service on that same day in the
23 ordinary course of business.

24 _____ (BY FACSIMILE) By use of facsimile machine telephone number (510) 845-3016, I served a copy of the
25 within document on the above interested parties at the facsimile numbers listed above. The transmission was
26 reported as complete and without error. The transmission report, which is attached to this proof of service, was
27 properly issued by the transmitting facsimile machine.

28 _____ (BY OVERNIGHT EXPRESS) I deposited in a box or other facility maintained by Overnight Express
delivery service, an express carrier service, or delivered to a courier or driver authorized by said express carrier
service to receive documents, a true copy or original of the document(s), in an envelope designated by said express
service carrier, with delivery fees paid or provided.

X (FEDERAL ONLY) I declare that I am employed in the office of a member of the bar of this Court at whose
direction the service was made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and
correct.

Dated: August 12, 2014 _____/s/ Steven Lynes_____.

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VERIFICATION

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Name v. Name
Alameda County Superior Court Case No.