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9 Attorneys for Defendant  
 10 JPMORGAN CHASE BANK, N.A.

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 13 **UNITED STATES DISTRICT COURT**  
 14 **FOR THE EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO**  
 15 **DIVISION**

16 VLADIMIR RIVKIN,

17  
 18 Plaintiff,

19 vs.

20 JPMORGAN CHASE BANK, N.A., a  
 New York association; FAY  
 21 SERVICING LLC, a Delaware limited  
 liability company; ALBERTELLI LAW  
 22 PARTNERS CALIFORNIA, PA, a  
 California corporation,, and DOES 1  
 23 through 10,

24 Defendants.  
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Case No. 14-2662-TLN-EFB

**STIPULATION TO EXTEND  
 TIME FOR DEFENDANT  
 JPMORGAN CHASE BANK, N.A.  
 TO RESPOND TO PLAINTIFF'S  
 FIRST AMENDED COMPLAINT  
 AND ORDER**

1 Plaintiff Vladimir Rivkin (“Plaintiff”) and Defendant JPMorgan Chase Bank,  
2 N.A. (“JPMC” and with Plaintiff, the “Parties”), hereby enter into this Stipulation  
3 to Extend Time for Defendant to Respond to Plaintiff’s First Amended Complaint  
4 with reference to the following facts:

5 **RECITALS**

6 A. On or about October 16, 2014, Plaintiff commenced an action in the  
7 Superior Court for the County of Nevada entitled Rivkin v. JPMorgan Chase Bank,  
8 N.A., et al., Case Number TCU14-5931 (the “State Court Action”).

9 B. On or around October 23, 2014, Plaintiff served the Summons and  
10 First Amended Complaint on JPMC.

11 C. On November 14, 2014, JPMC timely removed the State Court Action  
12 to this Court.

13 D. On November 25, 2014, the Parties entered into a stipulation to extend  
14 the time for JPMC to respond to the First Amended Complaint to allow the Plaintiff  
15 and co-defendant Fay Servicing LLC to engage in discussions regarding the then  
16 pending Trustee’s Sale and in view of the possibility of Plaintiff filing a second  
17 amended complaint. JPMC’s current deadline to respond to the First Amended  
18 Complaint is January 22, 2015.

19 E. On January 8, 2015, Plaintiff filed a request for leave to file a second  
20 amended complaint. (Docket No. 21.)

21 F. As of January 20, 2015, the Court has not yet ruled on Plaintiff’s  
22 request for leave to file the second amended complaint.

23 G. In view of Plaintiff’s pending request for leave to amend the operative  
24 complaint, the Parties have agreed to extend the time for JPMC to respond to  
25 Plaintiff’s First Amended Complaint to and including February 19, 2015.

26 F. This is the Parties’ second request for an extension of time to respond  
27 to the First Amended Complaint.

28 IT IS THEREFOR STIPULATED that JPMC shall have to and including

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February 19, 2015 to respond to Plaintiff's First Amended Complaint.

Dated: January 21, 2015

**FRANZ LAW**

By: /s/ Pamela M. Schuur (as authorized  
on January 21, 2015)  
Pamela M. Schuur

Attorneys for Plaintiff  
VLADIMIR RIVKIN

Dated: January 20, 2015

**MORGAN, LEWIS & BOCKIUS LLP**

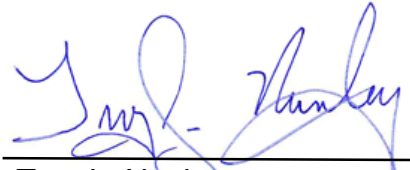
By: /s/ Amy M. Spicer  
Amy M. Spicer

Attorneys for Defendant  
JPMORGAN CHASE BANK, N.A.

**ORDER**

**IT IS SO ORDERED.**

Dated: January 21, 2015

  
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Troy L. Nunley  
United States District Judge