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 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.
 25

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.

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

20 F. On January 21, 2015, the Parties entered into a further stipulation to
21 extend the time for JPMC to respond to the First Amended Complaint in view of
22 Plaintiff’s pending request for leave to file a second amended complaint. (Docket
23 No. 25.) The Court entered an order approving the Parties’ stipulation on January
24 22, 2015. (Docket No. 26.)

25 G. On February 18, 2015, the Parties entered into a further stipulation to
26 extend the time for JPMC to respond to the First Amended Complaint in view of
27 Plaintiff’s pending request for leave to file a second amended complaint. (Docket
28

1 No. 27.) The Court entered an order approving the Parties' stipulation on February
2 19, 2015. (Docket No. 28.) JPMC's current deadline to respond to the First
3 Amended Complaint is March 25, 2015.

4 G. As of March 24, 2015, the Court has not yet ruled on Plaintiff's
5 request for leave to file the second amended complaint.

6 H. The Parties are engaged in discussions regarding options for resolving
7 the case without further litigation. In view of Plaintiff's pending request for leave
8 to amend the operative complaint and the Parties' on-going discussions, the Parties
9 have agreed to extend the time for JPMC to respond to Plaintiff's First Amended
10 Complaint to and including May 18, 2015.

11 I. This is the Parties' fourth request for an extension of time to respond
12 to the First Amended Complaint.

13 IT IS THEREFOR STIPULATED that JPMC shall have to and including
14 May 18, 2015 to respond to Plaintiff's First Amended Complaint.

15
16 Dated: March 24, 2015

FRANZ LAW

17
18 By: /s/ Pamela M. Schuur (as authorized
19 on March 24, 2015)
Pamela M. Schuur

Attorneys for Plaintiff
VLADIMIR RIVKIN

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21 Dated: March 24, 2015

MORGAN, LEWIS & BOCKIUS LLP

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

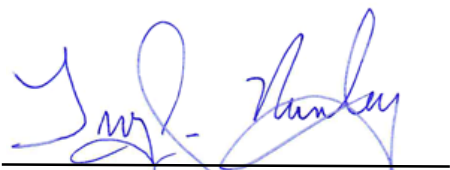
Attorneys for Defendant
JPMORGAN CHASE BANK, N.A.

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ORDER

IT IS SO ORDERED.

Dated: March 27, 2015



Troy L. Nunley
United States District Judge