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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.
 25

Case No. 14-cv-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 and March 25, 2015, the Parties entered into
26 further stipulations to extend the time for JPMC to respond to the First Amended
27 Complaint in view of Plaintiff’s pending request for leave to file a second amended
28

1 complaint and their ongoing settlement discussions. (Docket Nos. 27 & 31.) The
2 Court entered orders approving the Parties' stipulations on February 19, 2015 and
3 March 30, 2015. (Docket Nos. 28 & 32.) JPMC's current deadline to respond to
4 the First Amended Complaint is May 18, 2015.

5 H. As of May 12, 2015, the Court has not yet ruled on Plaintiff's request
6 for leave to file the second amended complaint.

7 I. The Parties are engaged in discussions regarding options for resolving
8 the case without further litigation. In view of Plaintiff's pending request for leave
9 to amend the operative complaint and the Parties' on-going discussions, the Parties
10 have agreed to extend the time for JPMC to respond to Plaintiff's First Amended
11 Complaint to and including July 27, 2015.

12 J. This is the Parties' fifth request for an extension of time to respond to
13 the First Amended Complaint.

14 IT IS THEREFOR STIPULATED that JPMC shall have to and including
15 July 27, 2015 to respond to Plaintiff's First Amended Complaint.

16
17 Dated: May 13, 2015

FRANZ LAW

18
19 By: /s/ Pamela M. Schuur (as authorized
20 on May 13, 2015)
Pamela M. Schuur

21 Attorneys for Plaintiff
VLADIMIR RIVKIN

22 Dated: May 12, 2015

MORGAN, LEWIS & BOCKIUS LLP

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

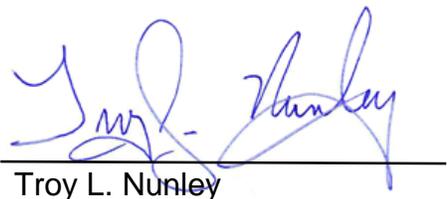
25 Attorneys for Defendant
26 JPMORGAN CHASE BANK, N.A.

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ORDER

IT IS SO ORDERED.

Dated: May 14, 2015



Troy L. Nunley
United States District Judge