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Attorneys for Defendant
JPMORGAN CHASE BANK, N.A.

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

VLADIMIR RIVKIN,

Plaintiff,

vs.

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

Defendants.

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

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

RECITALS

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

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

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

D. On November 25, 2014, the Parties entered into a stipulation to extend the time for JPMC to respond to the First Amended Complaint to allow the Plaintiff and co-defendant Fay Servicing LLC to engage in discussions regarding the then pending Trustee's Sale and in view of the possibility of Plaintiff filing a second amended complaint.

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

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

G. The Parties has since entered into three further stipulations to extend the time for JPMC to respond to the First Amended Complaint in view of Plaintiff's pending request for leave to file a second amended complaint and their ongoing

settlement discussions. (Docket Nos. 27, 31 & 36.) The Court entered orders approving the Parties' stipulations. (Docket Nos. 28, 32 & 37.) JPMC's current deadline to respond to the First Amended Complaint is July 27, 2015.

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

I. The Parties are engaged in discussions regarding options for resolving the case without further litigation. In view of Plaintiff's pending request for leave to amend the operative complaint and the Parties' on-going discussions, the Parties have agreed to extend the time for JPMC to respond to Plaintiff's First Amended Complaint to and including October 1, 2015.

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

IT IS THEREFOR STIPULATED that JPMC shall have to and including October 1, 2015 to respond to Plaintiff's First Amended Complaint.

Dated: July 24, 2015

FRANZ LAW

By: */s/ Pamela M. Schuur* (as authorized on July 24, 2015)
Pamela M. Schuur

Attorneys for Plaintiff
VLADIMIR RIVKIN

Dated: July 24, 2015

MORGAN, LEWIS & BOCKIUS LLP

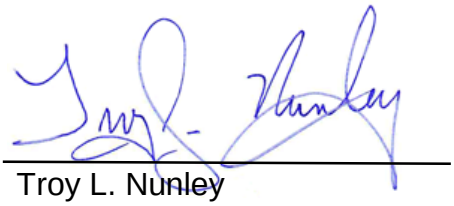
By: */s/ Amy M. Spicer*
Amy M. Spicer

Attorneys for Defendant
JPMORGAN CHASE BANK, N.A.

ORDER

IT IS SO ORDERED.

Dated: July 28, 2015



Troy L. Nunley
United States District Judge