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11 Attorneys for Defendant
 12 JPMorgan Chase Bank, N.A.

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
 21 New York association; FAY
 22 SERVICING LLC, a Delaware limited
 23 liability company; ALBERTELLI LAW
 24 PARTNERS CALIFORNIA, PA, a
 25 California corporation,, and DOES 1
 26 through 10,

27 Defendants.

Case No. 2:14-cv-02662-TLN-EFB

**STIPULATION TO EXTEND
 TIME FOR DEFENDANT
 JPMORGAN CHASE BANK, N.A.
 TO RESPOND TO PLAINTIFF'S
 SECOND 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. The Parties then entered into four further stipulations to extend the
26 time for JPMC to respond to the First Amended Complaint in view of Plaintiff’s
27 pending request for leave to file a second amended complaint and their ongoing
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1 settlement discussions. (Docket Nos. 27, 31, 36 & 38.) The Court entered orders
2 approving the Parties' stipulations. (Docket Nos. 28, 32, 37, & 39.)

3 H. On September 3, 2015, JPMC filed a motion to dismiss the First
4 Amended Complaint (the "Motion"). (Docket. No. 40).

5 I. The Court took the Motion under submission on October 6, 2015.
6 (Docket No. 45).

7 J. In late August of 2016, the primary attorney handling this matter for
8 JPMC, Joseph Quattrocchi, passed away.

9 K. On October 18, 2016, the Court granted the Motion but permitted
10 Plaintiff to file an amended complaint.

11 L. On October 31, 2016, Plaintiff filed a Second Amended Complaint.

12 M. To provide new counsel for JPMC sufficient time to review the matter
13 and prepare a response to the Second Amended Complaint, the Parties have agreed
14 to extend JPMC's deadline for responding to the Second Amended Complaint up to
15 and including December 9, 2016.

16 IT IS THEREFOR STIPULATED that JPMC shall have up to and including
17 December 9, 2016 to respond to Plaintiff's Second Amended Complaint.
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Dated December 1, 2016

FRANZ LAW

By: /s/ Pamela M. Schuur (as authorized
on December __, 2016)
Pamela M. Schuur

Attorneys for Plaintiff
VLADIMIR RIVKIN

Dated: December 1, 2016

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Joseph Bias
Joseph Duffy
Joseph Bias

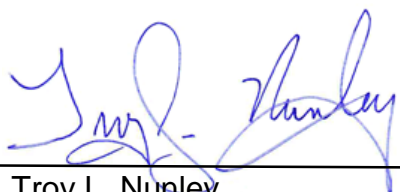
Attorneys for Defendant
JPMORGAN CHASE BANK, N.A.

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ORDER

IT IS SO ORDERED.

Dated: December 5, 2016



Troy L. Nunley
United States District Judge