

1 MAYER BROWN LLP
JOHN NADOLENCO (SBN 181128)
2 *jnadolenco@mayerbrown.com*
STEVEN E. RICH (SBN 198412)
3 *srich@mayerbrown.com*
350 South Grand Avenue, 25th Floor
4 Los Angeles, CA 90071-1503
Telephone: (213) 229-9500
5 Facsimile: (213) 625-0248

6 Attorneys for Defendant
CITIMORTGAGE, INC.

7
8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10
11 DAVID T. HEYDT and JENNIFER
F. HEYDT, individually, and on
12 behalf of the general public,

13 Plaintiffs,

14 v.

15 CITIMORTGAGE, INC., et al.,

16 Defendants.
17

Case No. 2:15-CV-00909-WBS-KJN

**STIPULATION AND PROPOSED
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT**

1 This Stipulation is entered into by and between Defendant CitiMortgage,
2 Inc. ("Citi"), and Plaintiffs David T. Heydt and Jennifer F. Heydt (the "Plaintiffs,"
3 and collectively with Citi, the "Parties"), as follows:

4 **RECITALS**

5 A. On April 27, 2015, Plaintiffs filed their Complaint (the "Complaint")
6 against Citi and others.

7 B. On May 15, 2015, Plaintiffs served their Complaint on Citi's
8 registered agent, making June 5, 2015 Citi's present deadline to respond to the
9 Complaint.

10 C. Given the number of issues in the 157-paragraph, 6-count Complaint
11 and the schedule of counsel for the Parties, the Parties have conferred and agreed
12 to extend Citi's time for responding to the Complaint through and including July
13 20, 2015.

14 D. Citi has not previously requested any extensions of time in this case,
15 and except as described herein, this Stipulation will have no effect on the schedule
16 for this case.

17 **AGREEMENT**

18 NOW, THEREFORE, based upon the foregoing and subject to Court
19 approval, the Parties hereby STIPULATE AND AGREE AS FOLLOWS:

20 1. The Parties incorporate by reference each of the Recitals contained in
21 paragraphs A through D hereinabove as if set forth in full herein.

22 2. The time for Citi to move, answer or otherwise respond to the
23 Complaint is extended to and includes July 20, 2015.

24 ///

25 ///

1 3. The Parties agree that by entering into this Stipulation, neither Party
2 waives any right or remedy.

3 Dated: May 27, 2015

MAYER BROWN LLP

4
5 By: /s/ Steven E. Rich
 Steven E. Rich

6 Attorneys for Defendant
7 CITIMORTGAGE, INC.

8 Dated: May 27, 2015

CONSUMERS FIRST ATTORNEYS, LLP

9 By: /s/ Jeremy K. Heeber (as authorized on
10 5/27/15)

 Jeremy K. Heebner

11 Attorneys for Plaintiffs
12 DAVID T. HEYDT and JENNIFER F.
13 HEYDT

14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15
16 Dated: May 28, 2015

17 

18 WILLIAM B. SHUBB

19 UNITED STATES DISTRICT JUDGE