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12 Attorneys for Defendants  
 13 WESTERN PROGRESSIVE, LLC and OCWEN LOAN SERVICING, LLC

14 **UNITED STATES DISTRICT COURT**  
 15 **EASTERN DISTRICT OF CALIFORNIA**  
 16 **SACRAMENTO DIVISION**

BRYAN CAVE LLP  
 560 MISSION STREET, 25<sup>TH</sup> FLOOR  
 SAN FRANCISCO, CA 94105-2994

17 DAN HANSEN,

18 Plaintiff,

19 vs.

20 WESTERN PROGRESSIVE, LLC, and  
 21 OCWEN LOAN SERVICING, LLC.

22 Defendant(s).

Case No. 2:15-CV-01426-MCE-CKD

**JOINT STIPULATION AND ORDER TO  
 STAY PROCEEDINGS PENDING  
 SETTLEMENT DISCUSSIONS**

Complaint Filed: July 6, 2015

1 This Stipulation is entered into by Plaintiff Dan Hansen (“Plaintiff”) and Defendants  
2 Western Progressive, LLC and Ocwen Loan Servicing, LLC (“Defendants,” collectively with  
3 Plaintiff, the “Parties”).

4 WHEREAS, Plaintiff filed his Verified Complaint (“Complaint”) on July 6, 2015.

5 WHEREAS, the Parties seek to stay all proceedings in this matter for three (3) months to  
6 **November 13, 2015**, including all discovery, dispositive motion, and pretrial deadlines, including  
7 Defendants’ deadline to respond to the Complaint, to avoid the unnecessary expenditure of party  
8 or Court resources.

9 WHEREAS, Defendants agree to cancel any foreclosure proceedings on the lien associated  
10 on the loan for the subject property located at 913 Baker Way, Rocklin, California 95765 pending  
11 review and determination by the current servicer of the modification options available for the  
12 subject loan.

13 WHEREAS, Plaintiff agrees to provide the loan modification application and any  
14 supporting documents or information requested by Defendants’ counsel in a timely manner and  
15 understands the failure to do so may result in denial of further processing Plaintiff’s loan  
16 modification application.

17 WHEREAS, Plaintiff understands that by reviewing Plaintiff’s loan for modification  
18 options during this stay of proceedings, Defendants have made no guarantee that Plaintiff will be  
19 granted or approved for a loan modification and that Defendants are under no obligation to grant  
20 or approve Plaintiff’s loan for a modification.

21 WHEREAS, the Parties agree that it would be beneficial to pursue informal resolution of  
22 this matter via exploration of loan modification options and continued settlement negotiations.

23 WHEREAS, the Parties agree that the stay requested herein is not requested for the  
24 purposes of delay and will not result in any prejudice to the Parties or to the Court.

25 WHEREAS, the Parties wish to stay all proceedings in this matter pending review and  
26 determination by the current servicer of Plaintiff’s loan modification options, which is  
27 economically and judicially efficient.

28 ///

1 **STIPULATION**

2 IT IS THEREFORE STIPULATED AND AGREED, by and between the Parties, and  
3 subject to the approval of the Court, that:

4 1. This matter is stayed until **November 13, 2015**.

5 2. Defendants' deadline to respond to the Complaint is extended through and  
6 including November 20, 2015.

7 **IT IS SO STIPULATED.**

8  
9 Dated: August 14, 2015

**BRYAN CAVE LLP**  
C. Scott Greene  
Tracy Talbot  
Monique Jewett-Brewster

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13 By: /s/ Monique Jewett-Brewster  
Monique Jewett-Brewster  
Attorneys for Defendants  
WESTERN PROGRESSIVE, LLC and OCWEN LOAN  
SERVICING, LLC

14  
15  
16 Dated: August 14, 2015

**LAW OFFICES OF CHARLES T. MARSHALL**

17  
18 By: /s/ Charles T. Marshall  
Charles T. Marshall  
Attorneys for Plaintiff  
DAN HANSEN

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21  
22 I hereby attest that I have on file the permission of all necessary filers for any signatures  
23 indicated by a "conformed" signature (/S/) within this e-filed document.

24  
25 /s/ Monique Jewett-Brewster

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**ORDER**

The Court, having reviewed the stipulation of Plaintiff Dan Hansen (“Plaintiff”) and Defendants Western Progressive, LLC and Ocwen Loan Servicing, LLC (collectively, “Defendants”), and good cause appearing, hereby orders as follows:

1. This matter is stayed until **November 13, 2015**.
2. Defendants’ deadline to respond to the Complaint is extended through and including November 20, 2015.

IT IS SO ORDERED.

Dated: August 19, 2015

  
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MORRISON C. ENGLAND, JR., CHIEF JUDGE  
UNITED STATES DISTRICT COURT