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9 Attorneys for Plaintiffs and Counter-Defendant
 10 WAKE FOREST ACQUISITIONS, L.P. c/o
 11 Corporation Service Company; SHAFFER ASSET
 12 MANAGEMENT CORPORATION c/o Corporation
 13 Service Company; ROBERT P. SHAFFER,
 14 individually and as Co-Trustee of the Robert P.
 15 Shaffer Revocable Trust; and MARY SHAFFER, as
 16 Co-Trustee of the Robert P. Shaffer Revocable Trust

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

17 WAKE FOREST ACQUISITIONS, L.P.;
 18 SHAFFER ASSET MANAGEMENT
 19 CORPORATION; ROBERT P. SHAFFER,
 20 individually and as Co-Trustee of the
 21 Robert P. Shaffer Revocable Trust; and
 22 MARY SHAFFER, as Co-Trustee of the
 23 Robert P. Shaffer Revocable Trust,

21 Plaintiffs,

22 v.

23 VANDERBILT COMMERCIAL
 24 LENDING, INC.; and GREGORY COOK,

24 Defendants.

25 VANDERBILT COMMERCIAL
 26 LENDING, INC.

27 Counterclaim-Plaintiff,

28 v.

CASE NO: 2:15-CV-02167-KJM-AC

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND VDRP DEADLINE**

Judge: Hon. Kimberly J. Mueller

1 WAKE FOREST ACQUISITIONS, L.P.,

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3 Counterclaim-
Defendant.

4 WHEREAS, on October 28, 2016, the NOTICE OF APPOINTMENT from VDRP
5 Administrator appointing William Robinson, of Best Best & Krieger LLP, as VDRP Neutral
6 Attorney pursuant to Local Rule 271 (e)(1) was entered on the Docket (Dkt. No. 33);

7 WHEREAS, Local Rule 271 (e)(1) requires the parties to complete the proposed ADR
8 with 91 days after the Neutral is selected, which makes January 27, 2017 the deadline for the
9 parties completing their VDRP session in this case;

10 WHEREAS, having not heard from the Neutral whatsoever, on January 10, 2017, counsel
11 for Plaintiffs contacted Mr. Robinson;

12 WHEREAS, Mr. Robinson wrote to all parties to this litigation on January 13, 2017,
13 setting a preliminary telephone conference for January 31, 2017 at 11:00 a.m.; and

14 WHEREAS, at that time, Mr. Robinson proposed several mediation session dates in
15 February and March 2017.

16 THEREFORE, since the parties will not be able to complete the mediation within the
17 required 91 day timeframe, the parties hereby agree and stipulate that, subject to the Court's
18 approval, that the ADR completion deadline be extended through and including March 17, 2017
19 to allow the parties to complete the ADR process.

20 Dated: January 24, 2017

HOPKINS & CARLEY
A Law Corporation

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23 By: /s/ Monique D. Jewett-Brewster

Maria S. Bellafronto
Monique D. Jewett-Brewster
Attorneys for Plaintiffs and Counter-
Defendant

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Dated: January 24, 2017

BOUTIN JONES INC.

By: /s/ Kelley M. Lincoln
Robert D. Swanson, Esq.
Kelley M. Lincoln, Esq.
Attorneys for Defendant Gregory Cook
and Defendant and Counterclaim-Plaintiff
VANDERBILT COMMERCIAL
LENDING, INC.

IT IS SO ORDERED.

Dated: January 27, 2017


UNITED STATES DISTRICT JUDGE