

1 Richard J. Reynolds (SBN 89911)
 E-mail: rreynolds@bwslaw.com
 2 Martin Kosla (SBN 247224)
 E-mail: mkosla@bwslaw.com
 3 BURKE, WILLIAMS & SORENSEN, LLP
 1851 East First Street, Suite 1550
 4 Santa Ana, CA 92705-4067
 Tel: 949.863.3363 Fax: 949.863.3350

5 Attorneys for Defendant
 6 MTC FINANCIAL INC. dba TRUSTEE CORPS
 (erroneously named herein as TRUSTEE CORPS)
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8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

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 11 TIMOTHY J. PELLEGRINI and
 LORIBETH B. PELLIGRINI,

12 Plaintiffs,

13 v.

14 JP MORGAN CHASE BANK, N.A.;
 15 DEUTSCHE BANK NATIONAL
 TRUST COMPANY, AS TRUSTEE
 16 FOR WAMU MORTGAGE PASS-
 THROUGH CERTIFICATES SERIES
 17 2003-AR8; TRUSTEE CORPS,
 business form unknown; and
 18 AND DOES 1 through 50, inclusive

19 Defendants.
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Case No. 2:16-cv-02214-JAM-KJN

**STIPULATION OF DEFENDANT
 MTC FINANCIAL INC. dba
 TRUSTEE CORPS AND
 PLAINTIFFS TO EXTEND TIME
 TO RESPOND TO COMPLAINT
 TO DATE AFTER HEARING OF
 PLAINTIFF'S MOTION TO
 REMAND; ORDER**

Complaint Filed: 07/15/16
 Trial Date: None

21 WHEREAS, Plaintiffs Timothy J. Pellegrini and Loribeth B. Pellegrini
 22 (collectively, "Plaintiffs") filed their operative Complaint ("Complaint") on July 15,
 23 2016 in the Superior Court of the State of California in and for the County of
 24 Sacramento.

25 WHEREAS, Plaintiffs served the Complaint on September 15, 2016 on
 26 Defendant MTC Financial Inc. dba Trustee Corps ("Trustee Corps").

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1 WHEREAS, on September 16, 2016, Defendants JPMorgan Chase Bank,
2 N.A. and Deutsche Bank National Trust Company as Trustee for WaMu Mortgage
3 Pass-Through Certificates Series 2003-AR8 (collectively, “JPMorgan Defendants”)
4 filed a Notice of Removal (Doc. #1) removed this case from the Sacramento
5 Superior Court to this United States District Court in and for the Eastern District of
6 California.

7 WHEREAS, on or about October 17, 2016, Plaintiffs filed a Motion to
8 Remand (Doc. #6) (“Motion to Remand”) requesting that the case be remanded
9 back to Sacramento Superior Court, with the Motion to Remand being set for
10 hearing in this Court on December 13, 2016, at 1:30 p.m.

11 WHEREAS, on or about October 19, 2016, Plaintiffs and Trustee Corps, by
12 and through their attorneys of record, filed a Stipulation (Doc. #9) pursuant to L.R.
13 144(a) to automatically extend the time by 28-days for Trustee Corps to file a
14 responsive pleading to the Complaint by November 3, 2016.

15 WHEREAS, based on the current responsive pleading deadline of November
16 3, 2016, any Motion to Dismiss by Trustee Corps will need to be filed and opposed
17 before the hearing of the Motion to Remand on December 13, 2016.

18 WHEREAS, if the Motion to Remand is granted, any such Motion to Dismiss
19 may be rendered moot before it is heard.

20 WHEREAS, in addition to avoiding the waste of valuable judicial resources,
21 the parties would like to avoid the necessity and expense of having to prepare and
22 oppose a Motion to Dismiss that may be rendered moot.

23 WHEREAS, this is the *second* extension between Plaintiffs and Trustee
24 Corps to extend the time for Trustee Corps to file a responsive pleading to the
25 Complaint.

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1 WHEREFORE, Plaintiffs and Trustee Corps, by and through their attorneys
2 of record, hereby stipulate and request that the time for Trustee Corps to file a
3 responsive pleading to the Complaint be extended to and including **December 20,**
4 **2016**, being seven days after the hearing of Plaintiffs' Motion to Remand which is
5 currently set for December 13, 2016.

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7 Dated: November 1, 2016

BURKE, WILLIAMS & SORENSEN, LLP

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By: /s/ Martin Kosla
Richard J. Reynolds
Martin Kosla
Attorneys for Defendant
MTC FINANCIAL INC. dba TRUSTEE
CORPS

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14 Dated: November 1, 2016

UNITED LAW CENTER

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By: /s/ Danny A. Barak
Stephen J. Foondos
Danny A. Barak
Attorneys for Plaintiffs
TIMOTHY J. PELLEGRINI and
LORIBEITH B. PELLEGRINI

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ORDER

THE PARTIES HAVING STIPULATED THERETO AND GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED THAT the time for Trustee Corps to file a responsive pleading to the Complaint is extended to and including **December 20, 2016**, being seven days after the hearing of Plaintiffs' Motion to Remand currently set for December 13, 2016.

IT IS SO ORDERED:

DATED: 11/2/2016

/s/ John A. Mendez
United States District Court Judge