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7 Attorneys for Defendants
Caliber Home Loans, Inc.; and U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation
8 Trust (incorrectly sued as U.S. Bank National Association)

9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

13 JULIE A. KELLEY,) CASE NO.: 2:17-cv-01804-MCE-AC
14)
Plaintiff,)
15 vs.) **STIPULATION FOR EXTENSION OF**
16) **TIME FOR DISCOVERY TO BE**
CALIBER HOME LOANS, INC.; JPMORGAN) **COMPLETED; ORDER**
17 CHASE BANK; U.S. BANK NATIONAL) Date: November 1, 2018
18 ASSOCIATION; QUALITY LOAN SERVICE) Time: 2:00 p.m.
CORPORATION; and DOES 1 through 100,) Location: Courtroom 7, 14th Floor
19 inclusive,) [Filed concurrently with Motion for Extension
20 Defendants.) of Time for Discovery to Be Completed]
21) Complaint Filed: July 19, 2017

22 WHEREAS, on July 19, 2017, Plaintiff filed this action against Defendants JPMorgan
23 Chase Bank N.A. (“Chase”), Caliber Home Loans, Inc. (“Caliber”), and U.S. Bank Trust, N.A., as
24 Trustee for LSF9 Master Participation Trust (incorrectly sued as U.S. Bank National Association)
25 (“U.S. Bank Trust”) in the Superior Court of California, County of Sacramento;

26 WHEREAS, on August 28, 2017, Chase removed this action to this Court;

27 WHEREAS, on August 28, 2017, this Court filed its Initial Pretrial Scheduling Order;

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1 WHEREAS, the Initial Pretrial Scheduling Order required all discovery, with the exception
2 of expert discovery, to be completed no later than three hundred sixty-five (365) days from the
3 date the federal case was opened;

4 WHEREAS, on September 12, 2017, Plaintiff filed a motion to remand the case to state
5 court;

6 WHEREAS, on September 19, 2017, pursuant to the parties' stipulation, the Court
7 extended Defendants' deadline to respond to the Complaint to fourteen (14) days after the Court
8 issued an order denying the motion to remand;

9 WHEREAS, on May 2, 2018, this Court denied the motion to remand;

10 WHEREAS, on May 11, 2018, Caliber and the U.S. Bank Trust filed their motion to
11 dismiss the Complaint;

12 WHEREAS, on May 17, 2018, Chase filed its motion to dismiss the Complaint;

13 WHEREAS, the Court, on its own motions, vacated the hearings on both motions to
14 dismiss, and the motions to dismiss are presently under submission with the Court;

15 WHEREAS, the parties agree it would be a more efficient use of party and judicial
16 resources for this Court to adjudicate the pending motions to dismiss before Defendants complete
17 discovery.

18 NOW THEREFORE, the parties HEREBY STIPULATE AND AGREE AS FOLLOWS:

19 The deadline for Defendants to complete discovery shall be extended until 120 days after the
20 deadline, if any, for Defendants' answers to the Complaint.

21 **IT IS SO STIPULATED.**

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23 Dated: September 11, 2018

Respectfully submitted,
DAVIS WRIGHT TREMAINE LLP

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By: /s/ John Freed
(as authorized on September 11, 2018)
Joseph E. Addiego III
John Freed
Attorneys for Defendant JPMorgan
Chase Bank, N.A.

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Dated: September 11, 2018

Respectfully submitted,
LOCKE LORD

By: /s/ Kinga L. Wright
Regina McClendon
Kinga L. Wright
Attorneys for Defendants Caliber Home
Loans, Inc. and U.S. Bank Trust, N.A.,
as Trustee for LSF9 Master
Participation Trust (incorrectly sued as
U.S. Bank National Association)

Dated: September 11, 2018

Respectfully submitted,
FRY LAW CORPORATION

By: /s/ Christopher Fry
(as authorized on September 11, 2018)
Christopher Fry
Attorney for Plaintiff Julie Kelley

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ORDER

Presently before the Court is the parties' Stipulation for Extension of Time for Discovery to Be Completed (the "Stipulation"). Having reviewed the Stipulation and having considered the status of the case, and finding good cause, the Court GRANTS the Stipulation, as follows:

Defendants' deadline to complete discovery shall be extended until 120 days after the deadline, if any, for Defendants' answers to the Complaint.

IT IS SO ORDERED.

Dated: September 17, 2018


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE