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5 Attorneys for Defendants
 6 VIKI RAAB AND NEW CENTURY TITLE
 COMPANY

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

SHARTSIS FRIESE LLP
 ONE MARITIME PLAZA
 EIGHTEENTH FLOOR
 SAN FRANCISCO, CA 94111

12 RICARDO MARCELOS,
 13 Plaintiff,

14 v.

15 EDWIN MAURICIO PARADA
 DOMINGUEZ, GLENDA PARADA,
 16 LORENZO PARADA, VIKI RAAB,
 COUNTRYWIDE HOME LOANS,
 17 ARGENT MORTGAGE COMPANY,
 LLC, PRIMESTAR FINANCIAL
 18 SERVICES, SHO AIB MAHMUD,
 FINANCIAL TITLE COMPANY, NEW
 19 CENTURY TITLE COMPANY,
 RECONTRUST COMPANY, N.A., AND
 20 DOES 1 through 100,

21 Defendants.

Case No. CV08-0056 WHA

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING TIME IN WHICH
 NEW CENTURY TITLE COMPANY AND
 VIKI RAAB MAY RESPOND TO THE
 COMPLAINT**

Judge: Hon. William H. Alsup
 Complaint Filed: January 4, 2008

23 Pursuant to Local Rule 6-1(a), Plaintiff Ricardo Marcelos (“Plaintiff”) and Defendants
 24 New Century Title Company (“New Century”) and Viki Raab (“Raab”), by and through they
 25 respective counsel, all subject to the approval of this Court, hereby stipulate February 25, 2008 as
 26 the date by which New Century and Raab must answer or otherwise respond to the Complaint
 27 presently on file herein, based upon the following facts and circumstances:

1. Plaintiff filed his Complaint on January 4, 2008.

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- 1 2. New Century was served with the Complaint and summons through its agent for
- 2 service of process on January 15, 2008.
- 3 3. Raab has not yet been served with the Complaint and summons as of the date of
- 4 this stipulation.
- 5 4. Raab is a former employee of New Century, but is no longer employed by New
- 6 Century.
- 7 5. Counsel for New Century has agreed to represent Raab and to accept service on
- 8 her behalf.
- 9 6. Starting on or about February 1, 2008, Raab will be out of the state for two weeks,
- 10 and counsel for New Century and Raab would like to meet with her upon her
- 11 return from vacation, before filing a responsive pleading.
- 12 7. The parties believe that judicial efficiency and economy will be promoted if New
- 13 Century and Raab respond to the Complaint at the same time.
- 14 8. No prior extensions of time have been requested by New Century or Raab.
- 15 9. This extension does not alter the date of any event or any deadline already fixed by
- 16 Court order.
- 17 10. Local Rule 6-1(a) does not require a Court order when the change in the date for a
- 18 responsive pleading will not alter the date of any event or any deadline already
- 19 fixed by Court order.
- 20 11. The parties nevertheless want to ensure that the extension of time is acceptable to
- 21 the Court.

22 Now therefore, based upon the foregoing, the parties hereto stipulate as follows:

23 The time within which New Century and Raab may answer or otherwise respond to the

24 Complaint is extended to and including February 25, 2008.

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DATED: January 31, 2008

SHARTSIS FRIESE LLP

By: /s/ Simone M. Katz
SIMONE M. KATZ

Attorneys for Defendants
VIKI RAAB AND NEW CENTURY TITLE
COMPANY

DATED: January 31, 2008

LIUZZI, MURPHY & SOLOMON, LLP

By: /s/ Michael E. Hale
MICHAEL E. HALE

Attorneys for Plaintiff
RICARDO MARCELOS

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ORDER

Having read the foregoing stipulation of the Parties, and good cause appearing therefore, it is hereby ordered the time within which New Century and Raab may answer or otherwise respond to the Complaint is extended to and including February 25, 2008.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: February 4, 2008

HONORABLE WILLIAM ALSUP




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DATED: January 31, 2008

SHARTSIS FRIESE LLP

By: 
SIMONE M. KATZ

Attorneys for Defendants
VIKI RAAB AND NEW CENTURY TITLE
COMPANY

DATED: January __, 2008

LIUZZI, MURPHY & SOLOMON, LLP

By: 
MICHAEL E. HALE

Attorneys for Plaintiff
RICARDO MARCELOS

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