

BRYAN CAVE LLP
2 EMBARCADERO CENTER, SUITE 1410
SAN FRANCISCO, CALIFORNIA 94111

1 **BRYAN CAVE LLP**
James Goldberg, California Bar No. 107990
2 Stephanie A. Blazewicz, California Bar No. 240359
Two Embarcadero Center, Suite 1410
3 San Francisco, CA 94111-3907
Telephone: (415) 675-3400
4 Facsimile: (415) 675-3434
Email: james.goldberg@bryancave.com
5 Email: stephanie.blazewicz@bryancave.com

6 **BRYAN CAVE LLP**
Robert E. Boone III, California Bar No. 132780
7 120 Broadway, Suite 300
Santa Monica, California 90401-2386
8 Telephone: 310-576-2100
Facsimile: 310-576-2200
9 Email: reboone@bryancave.com

10 Attorneys for Defendant
COUNTRYWIDE HOME LOANS, INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13

14 TERRY BROWN and CAROLINE
15 BROWN,

16 Plaintiffs,

17 vs.

18 COUNTRYWIDE HOME LOANS,
19 INC., a New York corporation, et al.

20 Defendant.
21
22

Case No. C-08-05383-TEH

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND
DEFENDANT'S TIME TO FILE
REPLY MEMORANDUM IN
SUPPORT OF ITS MOTION TO
DISMISS**

Date: April 13, 2009
Time: 10:00 a.m.
Courtroom: 12, 19th Floor
Judge: Thelton E. Henderson

23
24
25 Plaintiffs Terry and Caroline Brown ("Plaintiffs") and Defendant
26 Countrywide Home Loans, Inc. ("CHL") jointly stipulate, pursuant to Civil Local
27 Rules 6-2 and 7-12, to extend the time CHL has to file its Reply Memorandum in
28

days.

1 In support of their stipulation, the parties state as follows:

2 1. Plaintiffs filed their Complaint in this action on October 24,
3 2008, which Defendants moved to dismiss. *See* Docket No. 7.

4 2. On the day their opposition was due, Plaintiffs filed their First
5 Amended Complaint ("FAC"). *See* Docket No. 10.

6 3. On February 12, 2009, CHL filed a Motion to Dismiss the FAC.
7 *See* Docket No. 13. That Motion was scheduled to be heard on March 23, 2009, at
8 10:00 a.m. Plaintiffs filed their Opposition to the Motion on March 2, 2009. *See*
9 Docket No. 16. Pursuant to Civil L.R. 7-3(c), CHL's Reply Memorandum in
10 Support of its Motion to Dismiss was due March 9, 2009 (14 days prior to the
11 March 23, 2009, hearing).

12 4. On March 3, 2009, this Court, sua sponte, continued the hearing
13 to April 13, 2009. *See* Docket No. 18.

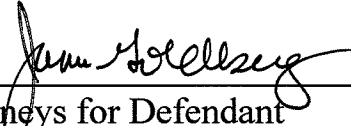
14 5. The parties believe, that, due to the issues raised, it would be
15 equitable for CHL to receive a 14 day extension to file its Reply Memorandum in
16 Support of its Motion to Dismiss to and until March 23, 2009.

17 6. If CHL is granted permission to file its Reply on March 23,
18 2009, the Court would still receive the Reply Memorandum 21 days prior to the
19 hearing. Hence, the Court would not have to reschedule the hearing date in order to
20 accommodate the parties' request.

21 7. Accordingly, the parties jointly stipulate to extend the date to file
22 the Reply Memorandum in Support of CHL's Motion to Dismiss by 14 days, to and
23 until March 23, 2009.

1 8. This stipulation is filed in good faith, and not for purpose of delay.
2

3 **BRYAN CAVE LLP**
4 Robert E. Boone, III
5 James Goldberg
6 Stephanie A. Blazewicz

7 By: 
8 Attorneys for Defendant
9 COUNTRYWIDE HOME LOANS, INC.

10 **WILLIAM S. BONNHEIM, PLC**
11 William S. Bonnheim

12 **WEIXEL LAW OFFICE**
13 James V. Weixel, Jr.

14 _____
15 Attorney for Plaintiffs

16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18
19 DATED: March __, 2009

20 _____
21 United States District Judge
22
23
24
25
26
27

BRYAN CAVE LLP
2 EMBARCADERO CENTER, SUITE 1410
SAN FRANCISCO, CALIFORNIA 94111

1 8. This stipulation is filed in good faith, and not for purpose of delay.
2

3 **BRYAN CAVE LLP**
4 Robert E. Boone, III
5 James Goldberg
6 Stephanie A. Blazewicz

7 By: *James Goldberg*
8 Attorneys for Defendant
9 COUNTRYWIDE HOME LOANS, INC.

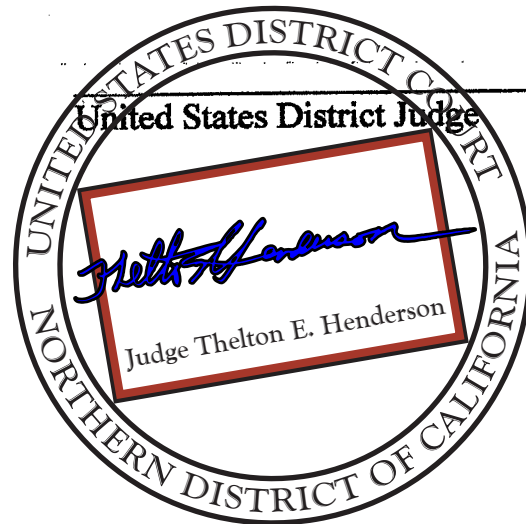
10 **WILLIAM S. BONNHEIM, PLC**
11 William S. Bonnheim

12 **WEIXEL LAW OFFICE**
13 James V. Weixel, Jr.
14 *James V. Weixel, Jr.*
15 Attorney for Plaintiffs

16 **ORDER**

17 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

18
19 DATED: March 5, 2009



SF01DOCS2562.1