

1 J. Brian McCauley (SBN 66762)  
 A Professional Law Corporation  
 2 [jbmapc@pacbell.net](mailto:jbmapc@pacbell.net)  
 425 California Street, Suite 1700  
 3 San Francisco, California 94104  
 Telephone: (415)974-1515  
 4 Facsimile: (415)543-0125

5 Attorneys for Plaintiff  
 KATY SULLIVAN

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 7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTERN DISTRICT OF CALIFORNIA

10 KATY SULLIVAN, also known as KATY  
 11 MARIE SULLIVAN,

12 Plaintiff,

13 v.

14 WASHINGTON MUTUAL BANK, FA,  
 JP MORGAN CHASE BANK, National  
 15 Association, BANK OF AMERICA,  
 National Association, CALIFORNIA  
 16 RECONVEYANCE COMPANY; and  
 17 DOES 1 through 50, inclusive Defendants.

Case No. CIV 09 2161 EMC

**JOINT STIPULATION FOR EXTENSION  
 OF TIME AND RESPONSE TO ORDER  
 TO SHOW CAUSE ; ORDER**

Date: November 4, 2014  
 Time: 10:30 a.m.  
 Dept: 5 - 17th Floor  
 Judge: Hon. Edward M. Chen

Action Filed: 4/22/09

18 **TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

19 Defendants JPMorgan Chase Bank, N.A. (“JPMorgan”), California Reconveyance  
 20 Company (“CRC”) and Bank of America, National Association, as successor by merger to  
 21 LaSalle Bank NA as trustee for WaMu Mortgage Pass-Through Certificates Series 2006-AR9  
 22 Trust (“B of A”) (together, “Defendants”), along with plaintiff Katy Sullivan (“Plaintiff”) (collectively the “Parties”), hereby submit this Joint Stipulation for Extension of Time and  
 23 Response to Order to Show Cause.  
 24

25 **1. Jurisdiction and Service**

26 Plaintiff has named the following as defendants: WASHINGTON MUTUAL BANK, FA,  
 27 JPMORGAN CHASE BANK, National Association, BANK OF AMERICA, National  
 28 Association, LASALLE BANK, National Association, CALIFORNIA RECONVEYANCE

1 COMPANY; and Does 1 through 50, inclusive.

2 This court has jurisdiction, because Plaintiff, in the initial complaint, alleges violations of  
3 the Federal Truth in Lending Act (“TILA”). (See Second Amended Complaint.)

4 **2. Status of the Case and Settlement Since Previous Joint Statement:**

5 Plaintiff seeks statutory damages under TILA, as well as general damages. Plaintiff also  
6 seeks rescission under TILA. Defendants deny the allegations of the Complaint and contend that  
7 they did not participate in the origination process which is the subject of Plaintiff’s legal action.

8 Plaintiff owns a 2 unit condominium which is encumbered by the loan which is the subject  
9 of this litigation. Plaintiff and Defendants have arrived at a conditional settlement which  
10 contemplates the following:

11 1) Plaintiff will deed one of the condo units to Defendant, which will then be sold  
12 and the proceeds paid to Defendant,

13 2) Plaintiff will retain the other unit, and Defendant has agreed to modify the existing  
14 loan such that the security for that loan will consist solely of a loan on the unit retained by  
15 Plaintiff.

16 The parties have completed the negotiation and drafting of their Settlement Agreement; it  
17 has been signed by Plaintiff Katy Sullivan and transmitted to Defendants, but is still in the  
18 process of execution by Defendants. A stipulation for dismissal in accord with the terms of the  
19 Settlement has been drafted and transmitted along with a form of Order of Dismissal.

20 The internal execution processes for Defendants is unfortunately lengthy, and a further  
21 extension of the Order to Show Cause appearance currently set for November 4, 2014 is hereby  
22 agreed and stipulated, and this Joint Stipulation is submitted to request an extension to December  
23 11, 2014.

24 Accordingly, it is jointly stipulated and requested by and between the parties that this  
25 Court set over its current Order to Show Cause appearance to December 11, 2014.

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Respectfully submitted,

DATED: October 30, 2014

ALVARADOSMITH  
A Professional Corporation

By: /s/ Theodore E. Bacon  
THEODORE E. BACON  
Attorneys for Defendants  
JPMORGAN CHASE BANK, N.A.,  
CALIFORNIA RECONVEYANCE  
COMPANY and BANK OF AMERICA,  
NATIONAL ASSOCIATION, as successor  
by merger to LaSalle Bank NA as trustee for  
WaMu Mortgage Pass-Through Certificates  
Series 2006-AR9 Trust

DATED: October 30, 2014

By: /s/ J. Brian McCauley  
J. BRIAN MCCAULEY, ESQ..  
Attorneys for Plaintiff,  
KATY SULLIVAN

IT IS SO ORDERED that the OSC is continued to 12/11/14 at 1:30 p.m.  
An updated status report shall be filed by 12/4/14.

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Edward M. Chen  
U.S. District Judge

