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9 Attorneys for Defendants
 10 COUNTRYWIDE HOME LOANS, INC. and
 11 MORTGAGE ELECTRONIC INFORMATION SYSTEMS, INC.

12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**

14
 15 WENCESLAO BOJORQUEZ,
 16 Plaintiff,

17 v.

18 MARTHA GUTIERREZ, MIGUEL
 GUTIERREZ, JOMICA REAL ESTATE
 19 INVESTMENT GROUP, INC., MARIN 1
 REAL ESTATE, INC.,
 20 REALTYCOMP.COM-SAN FRANCISCO,
 TJOMAN BUDITALISM, DOCUMENTS
 21 SYSTEMS, INC., OWNIT MORTGAGE
 SOLUTIONS, INC., MORTGAGE
 22 ELECTRONIC REGISTRATION SYSTEMS,
 INC., OCWEN LOAN SERVICING, LLC,
 23 COUNTRYWIDE HOME LOANS, INC.,
 LITTON LOAN SERVICING LP,
 24 MORTGAGE SERVICES, INC.,
 SPECIALIZED LOAN SERVICING LLC,
 25 CHICAGO TITLE COMPANY and CINDY
 BOUNVILLE,
 26 Defendants.

Case No. 3:09-cv-03684-SI

**STIPULATION AND [PROPOSED]
 ORDER EXTENDING TIME FOR
 COUNTRYWIDE HOME LOANS, INC.
 AND MORTGAGE ELECTRONIC
 REGISTRATION SYSTEMS, INC. TO
 RESPOND TO COMPLAINT**

1 Counsel for Plaintiff WENCESLAO BOJORQUEZ (“Plaintiff”), and counsel for
2 defendants COUNTRYWIDE HOME LOANS, INC. and MORTGAGE ELECTRONIC
3 REGISTRATION SYSTEMS, INC. (“Defendants”) submit this stipulation and proposed order
4 relating to the operative complaint in this case:

5 WHEREAS, Plaintiff filed a Complaint in this action on August 12, 2009;

6 WHEREAS, Defendants executed a Waiver of Service of Summons dated August 27,
7 2009;

8 WHEREAS, the parties previously stipulated to an initial 30-day extension of time for
9 Defendants to respond to the Complaint until November 25, 2009;

10 WHEREAS, Plaintiff and Defendants are actively engaged in early settlement discussions;

11 WHEREAS, Plaintiff and Defendants agree that judicial economy and the interests of the
12 parties in avoiding unnecessary expenses would be best served and promoted by extending the
13 time required for Defendants to respond to the Complaint;

14 IT IS HEREBY STIPULATED AND AGREED by Plaintiff and Defendants that the time
15 required for Defendants to respond to Plaintiff’s Complaint shall be extended by an additional 20
16 days, and Defendants shall file their response no later than December 15, 2009. Defendants shall
17 notice any hearing on a Motion to Dismiss for February 5, 2010, in accordance with this Court’s
18 instruction. This Stipulation will not affect the schedule for the case.

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1 Dated: November 23, 2009

BRYAN CAVE LLP
Robert A. Padway, Esq.
Berrie R. Goldman, Esq.

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By: /s/ Berrie R. Goldman

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Berrie R. Goldman

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Attorneys for Defendants

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COUNTRYWIDE HOME LOANS, INC.,

COUNTRYWIDE BANK, FSB, and BANK OF

AMERICA

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8

Dated: November 23, 2009

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By: /s/ Antonio Cortés

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Antonio Cortés, SBN 142356

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Attorney for Plaintiff

WENCESLAO BOJORQUEZ

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STIPULATION EXTENDING TIME TO RESPOND
TO COMPLAINT

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[PROPOSED] ORDER

Having reviewed the Stipulation of Plaintiff WENCESLAO BOJORQUEZ, and Defendants COUNTRYWIDE HOME LOANS, INC. and MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. (“Defendants”), and good cause appearing, IT IS ORDERED THAT Defendants shall have an additional 20 days in which to file a response to Plaintiff’s Complaint. Defendants shall respond no later than December 15, 2009.

Dated: _____



Magistrate Judge
United States District Court
Northern District of California