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**9**

Attorneys for Defendants

**10** BAC HOME LOANS SERVICING, L.P.**11** (erroneously sued as COUNTRYWIDE HOME LOANS, INC.);**12** MORTGAGE ELECTRONIC REGISTRATION SYSTEMS,

INC.; RECONTRUST COMPANY, N.A.

**13****14 UNITED STATES DISTRICT COURT****15 NORTHERN DISTRICT OF CALIFORNIA****16****17** BEATA KUREK and CHRISTIAN KUREK,**18** Plaintiffs,**19** v.**20** COUNTRYWIDE HOME LOANS, INC.;  
**21** MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.;  
**22** RECONTRUST COMPANY; ANNA KASIA  
WODKOWSKA; IZT MORTGAGE, INC.  
**23** (DBA AMERITECH MORTGAGE) and  
DOES 1 through 30, inclusive,**24** Defendants.**25****26****27****28**

CASE NO.: CV 09-04307 BZ

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO  
COMPLETE MEDIATION**

1 This Stipulation is entered into by Plaintiffs BEATA AND CHRISTIAN KUREK  
2 (“Plaintiffs”) and Defendants COUNTRYWIDE HOME LOANS, INC., MORTGAGE  
3 ELECTRONIC REGISTRATION SYSTEMS, INC., RECONTRUST COMPANY, N.A., ANNA  
4 WODKOWSKA, AND IZT MORTGAGE, INC. (collectively, “Defendants”).

5 WHEREAS, on February 10, 2010, this Court referred this case to mediation;

6 WHEREAS, on March 5, 2010, the ADR unit appointed Barbara Cray as mediator;

7 WHEREAS, on May 15, 2010, the parties scheduled mediation for August 20, 2010;

8 WHEREAS, on June 30, 2010, defendants Countrywide Home Loans, Inc., Mortgage Electronic  
9 Registration Systems, Inc., and ReconTrust Company, N.A., substituted in new counsel;

10 WHEREAS, on July 26, 2010, the Court ruled on the motions to dismiss filed by defendants  
11 Anna Wodkowska, Countrywide Home Loans, Inc., Mortgage Electronic Registration Systems, Inc.,  
12 and ReconTrust Company, N.A.;

13 WHEREAS, Plaintiffs and Defendants agree that the parties must conduct discovery in order to  
14 conduct an effective mediation;

15 WHEREAS, due to the substitution of counsel, the recent ruling on the motions to dismiss, the  
16 necessity of discovery, and the availability of counsel, Plaintiffs and Defendants agree that they need  
17 additional time to schedule and complete mediation;

18 NOW, THEREFORE, Plaintiffs and Defendants desire and hereby **STIPULATE** that Plaintiffs  
19 and Defendants shall have until, and including, October 20, 2010 to complete mediation.

20 **IT IS SO STIPULATED.**

21  
22 Dated: August 3, 2010

**LAW OFFICES OF OXANA V. KOXLOV**

23  
24 By: /s/ Oxana V. Kozlov  
25 Oxana V. Kozlov  
26 Attorney for Plaintiffs  
27 BEATA KUREK and CHRISTIAN KUREK  
28

1 Dated: August 16, 2010

**BRYAN CAVE LLP**

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By: /s/ Stephanie A. Blazewicz

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Stephanie A. Blazewicz

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Attorneys for Defendants

BAC HOME LOANS SERVICING, L.P.

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(erroneously sued as COUNTRYWIDE HOME

7

LOANS, INC.); MORTGAGE ELECTRONIC

REGISTRATION SYSTEMS, INC.; RECONTRUST

COMPANY, N.A.

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9 Dated: August 3, 2010

**ROPERS, MAJESKI, KOHN & BENTLEY**

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By: /s/ Todd J. Wenzel

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Todd J. Wenzel

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Attorney for Defendant

ANNA KASIA WODKOWSKA

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14 Dated: August 9, 2010

**CLAPP MORONEY BELLAGAMBA &  
VUCINICH**

15

By: /s/ Joseph W. Strella

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Joseph W. Strella

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Attorney for Defendant

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IZT MORTGAGE, INC. (dba AMERITECH  
MORTGAGE)

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22 I, Stephanie A. Blazewicz, attest that the content of this document is acceptable to all  
23 persons required to sign the document.

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/s/ Stephanie A. Blazewicz

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**[PROPOSED] ORDER**

Having reviewed the stipulation of Plaintiffs BEATA AND CHRISTIAN KUREK (“Plaintiffs”) and Defendants Countrywide Home Loans, Inc., MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., RECONTRUST COMPANY, N.A., ANNA WODKOWSKA, and IZT MORTGAGE, INC. (collectively, “Defendants”), and good cause appearing,

**IT IS HEREBY ORDERED THAT** Plaintiffs and Defendants shall have until, and including, October 20, 2010 to complete mediation.

Dated: August 17, 2010



Magistrate Judge Bernard Zimmerman  
United States District Court  
Northern District of California