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9 Attorneys for Defendants
 10 BAC HOME LOANS SERVICING, L.P.
 11 (erroneously sued as COUNTRYWIDE HOME LOANS, INC.);
 MORTGAGE ELECTRONIC REGISTRATION SYSTEMS,
 12 INC.; RECONTRUST COMPANY, N.A.

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

CASE NO.: CV 09-04307 BZ

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE TRIAL AND
 RELATED PRETRIAL DATES**

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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 March 17, 2010, this Court issued an Order Scheduling Jury Trial and Other
6 Matters, which set the following pretrial schedule:

7	Trial Date:	Monday, February 7, 2011
8	Pretrial Conference:	Tuesday, January 18, 2011 at 4:00 p.m.
9	Last Day to Hear Dispositive Motions:	Wednesday, December 15, 2010
10	Last Day for Expert Discovery:	Friday, November 5, 2010
11	Last Day for Rebuttal Expert Disclosure:	Friday, October 29, 2010
12	Last Day for Expert Disclosure:	Friday, October 22, 2010
13	Close of Non-Expert Discovery:	Friday, October 15, 2010

14 WHEREAS, on April 1, 2010, defendant Anna Wodkowska filed a Motion to Dismiss the First
15 Amended Complaint;

16 WHEREAS, on May 19, 2010, the Court granted the Motion to Dismiss filed by defendant Anna
17 Wodkowska;

18 WHEREAS, on June 7, 2010, Plaintiffs filed a Second Amended Complaint;

19 WHEREAS, on June 11, defendants Countrywide Home Loans, Inc., Mortgage Electronic
20 Registration Systems, Inc., and ReconTrust Company, N.A., filed a Motion to Dismiss the Second
21 Amended Complaint;

22 WHEREAS, on June 21, 2010, defendant Anna Wodkowska filed a Motion to Dismiss the
23 Second Amended Complaint;

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

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

1 WHEREAS, the parties have scheduled mediation for October 20, 2010;

2 WHEREAS, due to the substitution of counsel, the recent ruling on the motions to dismiss, the
3 necessity of discovery, the continuance of mediation, and the availability of counsel, Plaintiffs and
4 Defendants agree that they need additional time to conduct discovery and prepare for trial;

5 NOW, THEREFORE, Plaintiffs and Defendants desire and hereby **STIPULATE** to the
6 following trial date and pretrial schedule:

7	Trial Date:	Monday, June 13, 2011
8	Pretrial Conference:	Tuesday, May 24, 2011 at 4:00 p.m.
9	Last Day to Hear Dispositive Motions:	Wednesday, April 20, 2010
10	Last Day for Expert Discovery:	Friday, March 11, 2011
11	Last Day for Rebuttal Expert Disclosure:	Friday, March 4, 2011
12	Last Day for Expert Disclosure:	Friday, February 25, 2011
13	Close of Non-Expert Discovery:	Friday, February 18, 2010

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15 **IT IS SO STIPULATED.**

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17 Dated: August 3, 2010

LAW OFFICES OF OXANA V. KOXLOV

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By: /s/ Oxana V. Kozlov
Oxana V. Kozlov
Attorney for Plaintiffs
BEATA KUREK and CHRISTIAN KUREK

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22 Dated: August 16, 2010

BRYAN CAVE LLP

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By: /s/ Stephanie A. Blazewicz
Stephanie A. Blazewicz
Attorneys for Defendants
BAC HOME LOANS SERVICING, L.P.
(erroneously sued as COUNTRYWIDE HOME
LOANS, INC.); MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.; RECONTRUST
COMPANY, N.A.

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Dated: August 3, 2010

ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ Todd J. Wenzel
Todd J. Wenzel
Attorney for Defendant
ANNA KASIA WODKOWSKA

Dated: August 9, 2010

**CLAPP MORONEY BELLGAMBA &
VUCINICH**

By: /s/ Joseph W. Strella
Joseph W. Strella
Attorney for Defendant
IZT MORTGAGE, INC. (dba AMERITECH
MORTGAGE)

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

 /s/ Stephanie A. Blazewicz
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 the February 7, 2011 trial date is continued until June 13, 2011. The pretrial schedule shall be as follows:

- Trial Date: Monday, June 13, 2011
- Pretrial Conference: Tuesday, May 24, 2011 at 4:00 p.m.
- Last Day to Hear Dispositive Motions: Wednesday, April 20, 2010
- Last Day for Expert Discovery: Friday, March 11, 2011
- Last Day for Rebuttal Expert Disclosure: Friday, March 4, 2011
- Last Day for Expert Disclosure: Friday, February 25, 2011
- Close of Non-Expert Discovery: Friday, February 18, 2010

IT IS FURTHER ORDERED THAT all other orders and deadlines in this Court’s March 17, 2010 Order Scheduling Jury Trial and Other Matters remain in effect.

Dated: August 18, 2010

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

