

1 REESE RICHMAN LLP
2 MICHAEL R. REESE, State Bar No. 206773
3 875 Avenue of the Americas, 18th Floor
4 New York, New York 10001
5 Tel: 212.643.0500
6 Fax: 212.253.4272
7 E-mail: michael@reeserichman.com

5 || Attorneys for Plaintiffs

6 MORGAN, LEWIS & BOCKIUS LLP
7 FRANKLIN BROCKWAY GOWDY, State Bar No. 047918
JEREMY S. GLADSTONE, State Bar No. 257972
8 One Market, Spear Street Tower
San Francisco, CA 94105-1126
Tel: 415.442.1000
9 Fax: 415.442.1001
E-mail: fgowdy@morganlewis.com

10 ROBERT M. BROCHIN (*Pro Hac Vice Pending*)
11 BENJAMIN WEINBERG (*Pro Hac Vice Pending*)
12 MORGAN, LEWIS & BOCKIUS LLP
13 200 South Biscayne Boulevard, Suite 5300
Miami, Florida 33131-2339
Tel: 305.415.3456
Fax: 305.415.3001

14 Attorneys for Defendants Mortgage Electronic Registration
15 Systems, Inc. and MERSCORP, Inc.

18 NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

21 MERCEDES PERLAS and LEN
22 VILLACORTA, on behalf of themselves
and all others similarly situated.

Plaintiffs,

24
25 V.
26 MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC. and
MERSCORP, INC.

Defendants

No. C 09-04500-CRB

**JOINT STIPULATION AND [PROPOSED]
ORDER RE: INITIAL CASE
MANAGEMENT CONFERENCE [FRCP 26
& L.R. 6-2]**

Judge: Hon. Charles R. Breyer
Dept.: Courtroom 8, 19th Floor

STIPULATION AND [PROPOSED] ORDER
RE: INITIAL CASE MANAGEMENT
CONFERENCE (No. C 09-04500-CRB)

WHEREAS, on September 23, 2009, plaintiffs Merced Perlas and Len Villacorta (together with plaintiff Merced Perlas, “Plaintiffs”), on behalf of themselves and others similarly situated, filed their Class Action Complaint (the “Complaint”) against defendants Mortgage Electronic Registration Systems, Inc., and MERSCORP, Inc. (together with defendant Mortgage Electronic Registration Systems, Inc., “MERS”);

WHEREAS, on September 23, 2009, the Court entered a case management order (the "CMC Order") whereby it ordered, among other things, that the initial case management conference shall be held January 15, 2010 at 8:30 a.m.;

WHEREAS, on November 13, 2009, the Court ordered that the deadline for MERS to file and serve its response to the Complaint was December 18, 2009.

THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

Pursuant to Local Rule 6-2, the initial case management conference shall be held on ~~January 29, 2010 at 8:30 a.m.~~ February 5, 2010 at 10:00 a.m..

IT IS SO AGREED AND STIPULATED.

Dated: December 28, 2009

REESE RICHMAN LLP

By /s/ Michael R. Reese
Michael R. Reese
Attorneys for Plaintiffs

Dated: December 28, 2009

MORGAN LEWIS & BOCKIUS LLP

By /s/ Franklin Brockway Gowdy
Franklin Brockway Gowdy
Attorneys for Defendants
Mortgage Electronic Registration Systems,
Inc. and MERSCORP, Inc.

IT IS SO ORDERED.

DATED: Jan. 5, 2010, 2009

