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20 Attorneys for Plaintiff AHMED WAHBA

21 UNITED STATES DISTRICT COURT
 22 NORTHERN DISTRICT OF CALIFORNIA
 23 SAN FRANCISCO DIVISION

24 AHMED WAHBA

25 Plaintiff,

26 v.

27 BANK OF AMERICA, NATIONAL
 28 ASSOCIATION; BANK OF AMERICA
 CORPORATION; STEVE OWEN, Manager,
 BANK OF AMERICA, Hayward, California;
 and DOES 1 to 25, Inclusive

Defendants.

Case No. 09-CV-04916-RS

**STIPULATED REQUEST TO
 CHANGE TIME PURSUANT TO
 CIVIL L.R. 6-2 AND [PROPOSED]
 ORDER**

Judge: Hon. Richard Seeborg
 Trial Date: March 7, 2011

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STIPULATION

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2 1. Though their undersigned counsel, Defendants Bank of America, National
3 Association, Bank of America Corporation, and Steve Owen (collectively “Defendants”), and
4 Plaintiff Ahmed Wahba hereby stipulate and agree to continue the deadline for hearing pre-trial
5 motions.

6 2. When this case was originally assigned to Hon. Judge Alsup, the initial
7 “Case Management Scheduling Order” set the last day to file pre-trial motions as September 9,
8 2010. *See* Docket No. 16, February 4, 2010, ¶ 10.

9 3. Upon receiving this case, this Court’s “Order Reassigning Case” indicated
10 that all deadlines previously imposed would remain in effect. *See* Docket No. 18, March 18,
11 2010, ¶ 5.

12 4. The Parties’ last Joint Case Management Statement also proposed
13 September 9, 2010 as the deadline for filing any pre-trial motions. *See* Docket No. 19, April 2,
14 2010, ¶¶ 9-10s.

15 5. The Court’s most recent “Case Management Scheduling Order” set
16 September 9, 2010 as the last day to hear any pre-trial motions. *See* Docket No. 20, April 8,
17 2010, ¶ 4.

18 6. The Parties request that the Court modify the current schedule and set the
19 deadline for hearing any pre-trial motions as October 7, 2010. This modification would restore
20 the Parties’ original understanding that pre-trial motions were required to be filed no later than
21 September 9, 2010.

22 7. The only other time modifications by stipulation that have been requested
23 in this matter were to continue the trial date (which the Court granted on April 22, 2010) and to
24 continue the deadline for designating expert testimony and disclosing expert reports (which the
25 Court granted on June 29, 2010).

26 3. The only effect of this request on the schedule for the case would be to
27 move the deadline to hear pre-trial motions from September 9, 2010 to October 7, 2010. This
28 stipulation would not change the current trial schedule, as trial is scheduled for March 7, 2011.

1 4. Both parties agree to the stipulation as indicated by their signatures below.
2 The parties respectfully request that the Court approve the Stipulation, pursuant to Civil L.R. 6-2
3 and enter an Order thereupon. A form of proposed Order is filed herewith.
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6 DATED: July 23, 2010

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE

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8 By: /s/ Katina B. Miner
 Katina B. Miner

9 Attorneys for Defendants Bank of America, National
10 Association, Bank of America Corporation, and
Steve Owen

11 DATED: July 23, 2010

LAW OFFICES OF CURTIS G. OLER

12
13 By: 
 Curtis G. Oler

14 Attorneys for Plaintiff Ahmed Wahba
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19 /s/ Katina B. Miner
 Katina B. Miner
20 Attorneys for Defendants BANK OF AMERICA,
21 NATIONAL ASSOCIATION, BANK OF
AMERICA CORPORATION, and STEVE OWEN
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ORDER

The Court having considered the above Stipulation, and good cause appearing therefore,

IT IS HEREBY ORDERED that the deadline for hearing pre-trial motions shall be continued from September 9, 2010 to October 7, 2010.

IT IS SO ORDERED.

DATED: July 26, 2010



Judge Richard Seeborg
UNITED STATES DISTRICT JUDGE