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8 Attorney for Plaintiff,  
 9 Joelle Kurrus

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 JOELLE KURRUS

13 Plaintiff,

14 vs.

15 JP MORGAN CHASE BANK, NATIONAL  
 16 ASSOCIATION; AND DOES 1-25, inclusive.

17 Defendants.

) Case No: C09-5521 SI  
 ) Hon. Susan Illston

) **STIPULATION AND PROPOSED ORDER**  
 ) **RE DEADLINE FOR MEDIATION AND**  
 ) **CONTINUED CASE MANAGEMENT**  
 ) **CONFERENCE**

) Complaint Filed: October 22, 2009  
 ) Removed: November 20, 2009  
 ) Trial Date: None

18 Plaintiff, Joelle Kurrus (Kurrus), by and through lead counsel of record, and Defendant,  
 19 JP Morgan Chase Bank, National Association (Chase) by and through counsel of record stipulate  
 20 as follows:

21 WHEREAS all parties have agreed that the opportunity to mediate this action may  
 22 bring a result that promotes the need for no further court action;

23 WHEREAS previous attempts to mediate have been disrupted by the vacating of the

1 then appointed mediator's involvement and by the relief and withdrawal of previous counsel of  
2 Kurrus;

3 WHEREAS a mediation date acceptable to all parties has been set for January 10th,  
4 2011 at 11:00 AM, and a readiness call for such mediation has been scheduled for December  
5 13th, 2011 at 1:30PM;

6 WHEREAS Kurrus is informed and believes that she has now submitted to Chase ALL  
7 of the documentation necessary for review in order to evaluate a possible loan modification and,  
8 which if allowed and then agreed, may promote the need for no further court action;

9 WHEREAS all parties believe justice will be furthered and judicial resources conserved  
10 if the parties are allowed additional time to mediate and to then continue the Case Management  
11 Conference until after such additional time has been granted;

12 IT IS HEREBY STIPULATED, and the parties request that this Court order that the  
13 deadline for mediation be set as January 31st, 2011 and that the presently scheduled Case  
14 Management Conference of December 14, 2010 at 3:00 PM, be instead scheduled for February  
15 8th at 2:30 PM, or as soon thereafter as may be heard by the court.

16 Respectfully submitted,

17 Dated: November 22, 2010

18 LAW OFFICE OF ALLAN J. CORY

19 By: /s/ Allan J. Cory  
20 Allan J. Cory, Counsel for Plaintiff,  
21 Joelle Kurrus

22 Dated: November 22, 2010

23 ADORNO YOSS ALVARADO & SMITH

24 By: /s/ Mikel A. Glavinovich  
25 Mikel A. Glavinovich  
26 Attorneys for Defendant JPMorgan Chase, N.A..  
27

**ORDER**

Pursuant to the stipulation of the parties and good cause appearing, the deadline for mediation is January 31st, 2011 and the Case Management Conference set for December 14, 2010, is hereby vacated and shall instead be scheduled for February 8<sup>th</sup> at 2:30 PM, or as soon thereafter as may be heard by the court.

**IT IS SO ORDERED.**



Dated \_\_\_\_\_

Hon. Susan Illston

United States District Judge

**\*\*END OF ORDER\*\***