1 2 3 4 5 6	Lisa M. Carvalho (SBN 161420) Email: lcarvalho@reedsmith.com Renee C. Feldman (SBN 253877) Email: RFeldman@reedsmith.com REED SMITH LLP 101 Second Street, Suite 1800 San Francisco, CA 94105-3659 Telephone: +1 415 543 8700 Facsimile: +1 415 391 8269 Attorneys for Defendant Wells Fargo Bank, N.A. (for itself and as successor in interest to Defendant	
7	Wachovia Bank, N.A.)	
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN FRANCISCO DIVISION	
11	MELANIE PANZONE,	No.: CV-10-2720-EMC
12	Plaintiff,	STIPULATION AND [PROPOSED] ORDER:
13	VS.	(1) EXTENDING TIME TO RESPOND TO
14	WACHOVIA BANK, N.A.; WELLS FARGO BANK, N.A.; and DOES 1 through 10, inclusive,	COMPLAINT, AND
15 16	Defendants.	(2) CONTINUING CASE MANAGEMENT CONFERENCE AND RELATED DEADLINE
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18	Whereas, Plaintiff Melanie Panzone ("Plaintiff") filed her Complaint on June 22, 2010, but	
19	has not yet served the Complaint on Defendant Wachovia Bank, N.A. or Defendant Wells Fargo	
20	Bank, N.A. (collectively, "Defendants"); and	
21		
22	Whereas, Plaintiff and Defendants have reached an agreement in principle regarding	
23	settlement of this matter, and are working to finalize the documentation of their agreement; and	
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25	Whereas, Plaintiff wishes to serve her Complaint within the time limit for service provided	
26	by the rules of this Court; and	
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28	Whereas, in consideration of the stipulation set forth herein, Defendants have agreed to	

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accept service (through their counsel) of the Complaint, with service effective October 19, 2010; and

Whereas, Plaintiff and Defendants request that the Court (a) extend Defendants' time to respond to the Complaint, and (b) continue the Initial Case Management Conference and related deadlines in order to allow the parties to finalize the documentation of their settlement, and failing that, to allow Defendants time to respond to the Complaint;

Now, therefore, IT IS HEREBY STIPULATED that an Order may be entered:

- (1) Extending Defendants' time to respond to the Complaint through and including December 1, 2010; and
- Continuing the Initial Case Management Conference from the presently-scheduled (2) at 1:30 p.m. date of November 10, 2010, to December 1, 2010, or as otherwise may be scheduled by the Court. Further, the parties will file their joint Case Management Conference Statement no later than November 24, 2010. The parties agree, and request that the Court confirm, that Defendants' participation in, and filing of, the joint Case Management Statement will neither constitute a response to the Complaint, nor constitute any waiver or forfeiture of any defenses or claims that may be raised by any Defendant at any time and in any manner, whether in a response to the Complaint or otherwise. A joint CMC Statement shall be filed by November 24, 2010.

DATED: October 19, 2010. THOMPSON WIGDOR & GILLY LLP

> /s/ Lawrence Pearson Lawrence M. Pearson Attorneys for Plaintiff Melanie Panzone

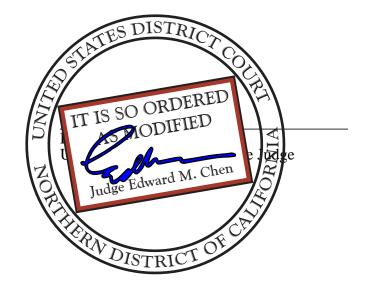
DATED: October 19, 2010. REED SMITH LLP

> /s/ Lisa Carvalho Lisa M. Carvalho Renee Feldman Attorneys for Defendant Wells Fargo Bank, N.A. (for itself and as successor in interest to Defendant Wachovia Bank, N.A.)

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IT IS SO ORDERED.

DATED: October ______, 2010



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