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5 ATTORNEYS FOR DEFENDANT AND CROSS-DEFENDANT
 6 STEWART TITLE OF CALIFORNIA, INC. ERRONEOUSLY
 SUED HEREIN AS STEWART TITLE OF CALIFORNIA
 7

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 FLAGSTAR BANK, FSB, a Federally
 Chartered Savings Bank,
 11
 Plaintiff,

12 v.

13 THE LOAN EXPERTS CORPORATION,
 14 d/b/a ALL AMERICAN FINANCE, a
 California corporation, HORMOZ NAZARI,
 15 an individual, ELIZABETH CORTEZ
 PADILLA, an individual, 1350 ESCONDIDO
 16 COASTAL, LLC, a California limited liability
 company, WESTLAKE COASTAL, LLC, a
 17 California limited liability company, VCH-
 SALINAS 1, LLC, a California limited
 18 liability company, ALLSTAR APPRAISALS,
 INC., a California Corporation, JAMES MAY,
 19 an individual, STEWART TITLE OF
 CALIFORNIA, a California corporation,,
 20
 Defendants.

CASE NO. C10-3190 CRB (DMR)

STIPULATION AND [~~PROPOSED~~] ORDER
 TO EXTEND TIME FOR STEWART TITLE
 OF CALIFORNIA, INC AND CROSS-
 CLAIMANTS TO PROVIDE A JOINT
 DISCOVERY LETTER; AND
 DECLARATION [L.R. 6-2]

21 AND RELATED CROSS-ACTION.
 22

23 This Stipulation is made pursuant to Local Rule 6-2 by and between Cross-Claimants The
 24 Loan Experts Corporation dba All American Finance and Hormoz Nazari (“Cross-Claimants”)
 25 and Cross-Defendant Stewart Title of California, Inc. (“Stewart Title”) through their respective
 26 attorneys.

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1 WHEREAS, on March 9, 2012, this Court denied Stewart Title's Motion to Dismiss
2 Cross-Claim without prejudice and issued its Notice of Reference and Order Re: Discovery
3 Procedures.

4 WHEREAS, On March 13, 2012, Stewart Title and Cross-Claimants met and conferred
5 as ordered;

6 WHEREAS, Cross-Claimants have produced documents, a Second Supplemental Initial
7 Disclosure, and intend to produce additional documents this week;

8 WHEREAS, Stewart Title has not had sufficient time to review the documents recently
9 produced and will not have sufficient time to review additional documents before the Court's
10 Friday, March 16, 2012, deadline to file a joint letter regarding the discovery dispute;

11 WHEREAS, Stewart Title and Cross-Claimants intend to continue to meet in good faith
12 in an attempt to resolve the pending death discovery dispute and need additional time to
13 complete the meet and confer process;

14 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE, through
15 their respective counsel of record, that the court should extend the period in which to file their
16 joint discovery letter with the Court to March 30, 2012.

17 IT IS SO STIPULATED.

18 DATED: MARCH 15, 2012

BERLINER COHEN

19
20 BY: /s/CHRISTIAN E. PICONE

NANCY J. JOHNSON

CHRISTIAN E. PICONE

ATTORNEYS FOR CROSS-DEFENDANT STEWART
TITLE OF CALIFORNIA, INC.

21
22
23 DATED: MARCH 15, 2012

MORGAN, FRANICH, FREDKIN & MARSH

24
25 BY: /s/FREEDA Y. LUGO

MARK B. FREDKIN

FREEDA Y. LUGO

ATTORNEYS FOR CROSS-CLAIMANTS THE LOAN
EXPERTS CORPORATION AND HORMOZ NAZARI

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DECLARATION OF CHRISTIAN E. PICONE

I, Christian E. Picone, declare:

1. I am an attorney licensed to practice in the state of California, I am admitted to practice before this honorable court, and I am an associate at the law firm of Berliner Cohen. I, along with Nancy J. Johnson, represent Cross-Defendant Stewart Title of California, Inc. in the above referenced case.

2. On March 13, 2012, Stewart Title and Cross-Claimants, through counsel, met and conferred.

3. Cross-Claimants recently produced documents and are in the process of producing additional documents.

4. Stewart Title has not had sufficient time in which to review the documents recently received and will be unable to review additional documents before the Court's deadline to file a joint discovery letter.

5. Additional time in which to file the joint discovery letter will allow the parties to continue to meet and confer an attempt to resolve or narrow the discovery dispute.

6. The Court has previously granted time modifications pursuant to stipulation regarding Rule 12(b) motions, enlarging time to serve, filing answers, and setting the initial Case Management Conference.

7. The granting of the stipulation and request to extend the date for the filing of the discovery letter would not require the Court to modify the schedule for this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 15th day of March 2012.

/s/CHRISTIAN E. PICONE

CHRISTIAN E. PICONE

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ORDER PURSUANT TO STIPULATION

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

That the Court vacates its previously ordered deadline of Friday, March 16, 2012 for the filing of the ordered joint discovery letter. Stewart Title and Cross-Claimants shall file a joint discovery letter no later than Friday, March 30, 2012. All other provisions of the Court's Notice of a Referenced and Order dated March 9, 2012, remain in effect.

DATED: March 16, 2012

