

1 KEKER & VAN NEST LLP  
 RACHAEL E. MENY - #178514  
 2 JENNIFER A. HUBER - #250143  
 SARAH B. FAULKNER - #263857  
 3 710 Sansome Street  
 San Francisco, CA 94111-1704  
 4 Telephone: (415) 391-5400  
 Facsimile: (415) 397-7188  
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 Attorneys for Plaintiff  
 6 FLAGSTAR BANK, FSB

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 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
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11 FLAGSTAR BANK, FSB, A Federally  
 12 Chartered Savings Bank,  
 13 Plaintiff,

14 v.

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

Case No. C 10-03190-CRB

**STIPULATION AND [PROPOSED]  
 ORDER FOR EXTENSION OF TIME  
 FOR EXCHANGE OF INITIAL  
 DISCLOSURES**

Judge: Hon. Charles R. Breyer

Date Comp. Filed: Michigan: 1/26/2010  
 USDC/SF: 7/21/2010

Trial Date: TBA

1 This Stipulation is made pursuant to Local Rule 6-2 by and between Plaintiff Flagstar  
2 Bank, FSB ("Flagstar"), Defendants and Cross-Claimants The Loan Experts d/b/a All American  
3 Finance ("Loan Experts") and Hormoz Nazari, Defendant and Cross-Defendant Stewart Title of  
4 California, Inc. ("Stewart Title"), and Defendants 1350 Escondido Coastal, LLC and Westlake  
5 Coastal, LLC ("Coastal Defendants") through their respective attorneys. Flagstar, Loan Experts,  
6 Nazari, Stewart Title, and the Coastal Defendants (collectively, the "parties") stipulate that:

7 1. The Court's Order dated August 23, 2010 set a case management conference in  
8 this case for November 5, 2010, and directed counsel to meet and confer not less than thirty (30)  
9 days in advance of this conference, or by October 6, 2010.

10 2. Under Rule 26(a)(1)(C), initial disclosures must be made at or within fourteen  
11 (14) days after the Rule 26(f) conference, or by October 20, 2010.

12 3. On October 15, 2010, the Court granted the Coastal Defendants' motion to  
13 dismiss, allowing Flagstar thirty (30) days leave to amend its complaint, or by November 15,  
14 2010. On this date, the court also vacated the November 5, 2010 case management conference.

15 4. The only previous time modifications in this case have been extensions of time to  
16 the Coastal Defendants' to respond to Flagstar's complaint, and extensions of time to Stewart  
17 Title to respond to Loan Experts and Nazari's Cross-Claim.

18 5. The parties have agreed to exchange initial disclosures by November 19, 2010.

19 6. This stipulation does not alter the schedule for this case. There is currently no  
20 date set for the case management conference and no scheduling order has been entered due to the  
21 Court's granting Flagstar leave to amend its complaint against the Coastal Defendants by  
22 November 15, 2010.

23 Dated: October 20, 2010

KEKER & VAN NEST LLP

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25 By: /s/ Rachael E. Meny

26 RACHAEL E. MENY  
27 Attorneys for Plaintiff  
28 FLAGSTAR BANK, FSB

1 Dated: October 20, 2010

BERLINER COHEN

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By: /s/ Christian Picone

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CHRISTIAN PICONE  
Attorneys for Defendant and Cross-  
Defendant STEWART TITLE OF  
CALIFORNIA, INC.

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7 Dated: October 20, 2010

HORAN LLOYD LAW OFFICES

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By: /s/ Elizabeth C. Gianola

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ELIZABETH C. GIANOLA  
Attorneys for Defendants and Cross-  
Claimants THE LOAN EXPERTS  
CORPORATION dba ALL AMERICAN  
FINANCE and HORMOZ NAZARI

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13 Dated: October 20, 2010

ENGLISH & GLOVEN, APC

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By: /s/ Jeffrey E. Flynn

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JEFFREY E. FLYNN  
Attorneys for Defendants  
1350 ESCONDIDO COASTAL, LLC and  
WESTLAKE COASTAL, LLC

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**ATTESTATION PURSUANT TO GENERAL ORDER 45**

I, Rachael E. Meny, am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR EXCHANGE OF INITIAL DISCLOSURES. In compliance with General Order 45, X.B., I hereby attest that the following attorneys have concurred in this filing: Christian Picone, Berliner Cohen, Counsel for Defendant and Cross-Defendant Stewart Title of California; Elizabeth C. Gianola, Horan Lloyd Law Offices, Counsel for Defendants and Cross-Claimants The Loan Experts Corporation d/b/a All American Finance and Hormoz Nazari; and, Jeffrey E. Flynn, English & Gloven, APC, Counsel for Defendants 1350 Escondido Coastal, LLC and Westlake Coastal, LLC.

/s/ Rachael E. Meny  
RACHAEL E. MENY

**~~PROPOSED~~ ORDER**

**PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:**

Plaintiff Flagstar Bank, FSB, Defendants and Cross-Claimants The Loan Experts d/b/a All American Finance and Hormoz Nazari, Defendant Cross-Defendant Stewart Title of California, Inc., and Defendants 1350 Escondido Coastal, LLC and Westlake Coastal, LLC shall exchange their initial disclosures by November 19, 2010.

Dated:     October 21    , 2010

