

1 MORGAN, LEWIS & BOCKIUS LLP
 2 CARRIE A. GONELL, State Bar No. 257163
 3 5 Park Plaza, Suite 1750
 4 Irvine, CA 92614
 5 Tel: 949.399.7000
 6 Fax: 949.399.7001
 7 e-mail: cgonell@morganlewis.com

8 Attorneys for Defendants
 9 JPMORGAN CHASE & CO., JPMORGAN CHASE
 10 BANK, N.A., and EMC MORTGAGE CORP.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 MARY ANN ADLAO, and MARIAN
 14 WILLIAMS, individually, on behalf of
 15 others similarly situated, and on behalf of
 16 the general public,

17 Plaintiffs,

18 vs.

19 JPMORGAN CHASE & CO.,
 20 JPMORGAN CHASE BANK, N.A., and
 21 EMC MORTGAGE CORP., as successors
 22 in interest to BEAR STEARNS, INC. and
 23 ENCORE CREDIT CORP., and Does 1-
 24 50, inclusive

25 Defendants.

Case No. CV 10-4508-EMC

Assigned For All Purposes To:
 Hon. Edward M. Chen

**STIPULATION TO EXTEND TIME TO
 RESPOND TO INITIAL COMPLAINT ; ORDER**

Complaint Served: Oct. 7, 2010
 Current Response Date: Oct. 28, 2010
 New Response Date: Nov. 11, 2010

1 **STIPULATION**

2 Pursuant to Civil Local Rule 6-1(a) for the United States District Court for the Northern
3 District of California, Defendants JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., and
4 EMC Mortgage Corp. (“Defendants”), and Plaintiffs Mary Ann Adlao and Marian Williams
5 (“Plaintiffs”), by and through their respective counsel, hereby Stipulate as follows:

6 WHEREAS, Plaintiffs’ initial complaint in this action was filed on October 5, 2010 and
7 served on Defendants on October 7, 2010;

8 WHEREAS, Defendants’ deadline to respond to Plaintiffs’ initial complaint is currently
9 October 28, 2010;

10 WHEREAS, as a one-time, professional courtesy, Plaintiff has agreed to consent to
11 Defendants’ request for a two-week extension of time, up to and including November 11, 2010,
12 for Defendants to respond to Plaintiffs’ initial complaint; and

13 WHEREAS, no prior extensions of time have been requested or granted, and said
14 extension will not alter the date of any event or deadline already fixed by Court order.

15 THEREFORE, IT IS HEREBY STIPULATED that Defendants’ time within which to
16 respond to the initial Complaint shall be continued fourteen (14) days, from October 28, 2010 to
17 November 11, 2010.

18 IT IS SO STIPULATED.

19 Dated: October 28, 2010

MORGAN, LEWIS & BOCKIUS LLP

20 By /S/ Carrie A. Gonell
21 Carrie A. Gonell
22 Attorneys for Defendants
23 JPMORGAN CHASE & CO.,
JPMORGAN CHASE BANK, N.A., and
EMC MORTGAGE CORP.

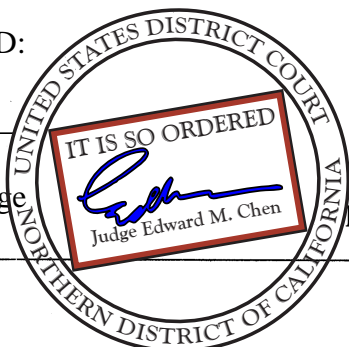
24 Dated: October 28, 2010

BRYAN SCHWARTZ LAW

25 By /S/ Bryan Schwartz
26 Bryan Schwartz, Esq.
27 Hillary J. Baker, Esq.
Attorneys for Plaintiffs
MARY ANN ADLAO and MARIAN
WILLIAMS

28 IT IS SO ORDERED:

Edward M. Chen
U.S. Magistrate Judge
DB2/22011845.1



STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT

1 **PROOF OF SERVICE**

2 *Adlao v. JPMorgan Chase & Co., et al.*
3 USDC-Northern District Case No. CV 10-4508

4 I am a resident of the State of California, County of Orange; I am over the age of eighteen
5 years and not a party to the within action; my business address is 5 Park Plaza, Suite 1750, Irvine,
6 California 92614.

7 On October 28, 2010, I served on the interested parties in this action the within
8 document(s) entitled:

9 **STIPULATION TO EXTEND TIME TO RESPOND TO**
10 **INITIAL COMPLAINT**

11 [] **BY FAX:** - by transmitting via electronic facsimile the document(s) listed above to
12 the fax number(s) set forth below on this date before 5:00 p.m.; I also caused the
13 fax machine to print such record(s) of the transmission.

14 [X] **BY MAIL:** - by placing the document(s) listed above in a sealed envelope with
15 postage thereon fully prepaid, in the United States mail at Irvine, California
16 addressed as set forth below. I am readily familiar with the firm's practice of
17 collection and processing correspondence for mailing. Under that practice it would
18 be deposited with the U.S. Postal Service on that same day with postage thereon
19 fully prepaid in the ordinary course of business. I am aware that on motion of the
20 party served, service is presumed invalid if postal cancellation date or postage
21 meter date is more than one day after date of deposit for mailing in affidavit.

22 [] **BY OVERNIGHT MAIL - By FEDERAL EXPRESS,** following ordinary
23 business practices for collection and processing of correspondence with said
24 overnight mail service, and said envelope(s) will be deposited with said overnight
25 mail service on said date in the ordinary course of business.

26 [] **BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED** – By placing true
27 copy(ies) thereof in sealed envelope(s) with Certified Mail, Return Receipt
28 Requested, postage thereon fully prepaid and by causing such envelope(s) to be
deposited in the mail at 5 Park Plaza, Suite 1750, Irvine, California 92614.

[] **BY ELECTRONIC SERVICE** - the parties listed below were served
electronically with the document(s) listed above by e-mailed PDF files on October
28, 2010. The transmission was reported as complete and without error. My
electronic notification address is 5 Park Plaza, Suite 1750, Irvine, California
92614. My e-mail address is dghani@morganlewis.com.

[X] **BY E-FILE** – I caused such documents to be transmitted by e-file with the Clerk
of the Court by using the CM/ECF system, which will send a notice of electronic
filing to the following:

DB2/21999653.1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Bryan Schwartz, Esq.
Hillary J. Baker, Esq.
BRYAN SCHWARTZ LAW
180 Grand Ave., Suite 1550
Oakland, CA 94612
Tel: (510) 444-9300
Fax: (510) 444-9301
Bryan@BryanSchwartzLaw.com
Hillary@BryanSchwartzLaw.com

*Attorneys for Plaintiffs MARY ANN ADLAO
and MARIAN WILLIAMS*

FEDERAL: I declare that I am employed in the office of a member of the Bar of this Court at whose direction this service was made.

Executed on October 28, 2010, at Irvine, California.



Diane C. Ghani