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14 Attorneys for Defendants
J.P. MORGAN SECURITIES INC., and
15 BEAR STEARNS ASSET BACKED SECURITIES I LLC.

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 THE CHARLES SCHWAB
20 CORPORATION,

21 Plaintiff,

22 vs.

23 J.P. MORGAN SECURITIES INC. F/K/A
24 BEAR, STEARNS & CO.;
BEAR STEARNS ASSET BACKED
25 SECURITIES I LLC; AND,
DOES 1-50,

26 Defendants.
27
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) Case No. CV 10-04522 JSW

)
) Removed from:
) Superior Court of the State of California
) For the City and County of San Francisco
) Civil No. CGC-10-503207

) **STIPULATION AND ~~PROPOSED~~ ORDER**
) **TO EXTEND TIME TO RESPOND TO THE**
) **COMPLAINT**

1 WHEREAS, on September 2, 2010, Plaintiff filed an action in the Superior Court of
2 California, San Francisco against Defendants, captioned *The Charles Schwab Corporation v. J.P.*
3 *Morgan Securities Inc., et al.*, Case No CGC-10-503207 (the “State Action”);

4 WHEREAS, on October 6, 2010, Defendants removed the State Action from the Superior
5 Court of California, San Francisco to the Northern District of California;

6 WHEREAS, on October 12, 2010, Plaintiff and Defendants stipulated to extend the date
7 by which Defendants must answer, move, or otherwise respond to the Complaint to January 7, 2011;

8 WHEREAS, on October 28, 2010, Plaintiff filed its Motion to Remand;

9 WHEREAS, on December 2, 2010, the Court entered the Parties’ Stipulation and
10 Proposed Order In Support of Administrative Motion Concerning Hearing and Briefing Schedule for
11 Motion to Remand, which, in part, set the hearing date for Plaintiff’s Motion to Remand for March 25,
12 2011;

13 WHEREAS, a Case Management Conference is scheduled for April 15, 2011;

14
15 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND AMONG THE
16 PARTIES HERETO AND THEIR COUNSEL OF RECORD THAT, SUBJECT TO THE APPROVAL
17 OF THE COURT:

- 18 (1) Defendants shall answer, move, or otherwise respond to the Complaint within
19 twenty-one (21) days from the date that the Court enters its order granting or
20 denying Plaintiff’s Motion to Remand;
- 21 (2) By entering into this Stipulation, Defendants do not waive their right to seek
22 adjournment or additional time from the Court in which to answer, move, or
23 otherwise respond to the Complaint;
- 24 (3) By entering into this Stipulation, the Parties do not waive, and expressly preserve,
25 any and all rights, claims, defenses, including all defenses relating to jurisdiction,
26 venue, and arbitrability.
- 27
28

1 Respectfully submitted,

2
3 Dated: December 17, 2010

Dated: December 17, 2010

4 /s/ Anne Hartman

/s/ Jason de Bretteville

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Leanne M. Wilson (*pro hac* app. to be submitted)

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17 *The Charles Schwab Corporation*

*Attorneys for J.P. Morgan Securities Inc.,
Bear Stearns Asset Backed Securities I LLC*

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19 * * * * *

20 NOW, THEREFORE, PURSUANT TO STIPULATION, IT IS SO ORDERED.

21
22 Dated: December 17, 2010


The Honorable Jeffrey S. White
United States District Court Judge

1 I, Jason de Bretteville, am the ECF User whose ID and password are being used to file
2 this Stipulation And [Proposed] Order To Extend Time To Respond To The Complaint. In compliance
3 with General Order 45, X.B., I hereby attest that Anne Hartman has concurred in this filing.
4

5 Dated: December 17, 2010

/s/ Jason de Bretteville
Jason de Bretteville

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