| 1 2 3 4 5 6 7 | ERIK J. OLSON (BAR NO. 175815) EJOlson@mofo.com BRIAN L. LEVINE (BAR NO. 246726) BLevine@mofo.com MORRISON & FOERSTER LLP 755 Page Mill Road Palo Alto, California 94304-1018 Telephone: 650.813.5600 Facsimile: 650.494.0792 Attorneys for Defendant CALIFORNIA RECONVEYANCE COMPANY | | |
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| 9 | IN THE UNITED STATES DISTRICT COURT | | |
| 10 | FOR THE NORTHERN DISTRICT OF CALIFORNIA | | |
| 11 | SAN FRANCISCO DIVISION | | |
| 12 | DIANA ENGEL, an individual, | Case No. 3:11-cv-00055-EMC | |
| 13 | Plaintiff, | | |
| 13 | V. | STIPULATION EXTENDING DATES; [P ROPOSE D] ORDER | |
| | WASHINGTON MUTUAL BANK, FA., a | DATES, [I KOI OSED] OKDEK | |
| 15 | business entity, form unknown; NATIONAL CITY BANK, a business entity, form unknown; | | |
| 16 17 | ALLIANCE TITLE COMPANY, a business entity, form unknown; UNITED TITLE AND SETTLEMENT, a business entity, form unknown; | | |
| 18 | CALIFORNIA RECONVEYANCE COMPANY, a business entity, form unknown; MORTGAGE | | |
| 19 | ELECTRONIC REGISTRATION SYSTEMS, INC., a business entity, form unknown; and DOES | | |
| 20 | 1-100 inclusive, | | |
| 21 | Defendants. | | |
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| 24 | Plaintiff DIANA ENGEL ("Plaintiff") and Defendant CALIFORNIA RECONVEYANCE | | |
| 25 | COMPANY ("Defendant"), through their respective undersigned counsel, hereby stipulate | | |
| 26 | pursuant to Local Rules 6-2 and 7-12 as follows: | | |
| 27 | WHEREAS, in addition to filing this lawsuit, Plaintiff has sought specific relief from | | |
| 28 | Defendants which may moot this lawsuit; and | | |
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| WHEREAS, Defendant believes that it is likely that a decision will be made regarding | |
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| said relief and communicated to Plaintiff within the near future; | |
| IT IS HEREBY STIPULATED THAT: | |
| 1. Plaintiff and Defendant stipulate and agree that the date for all Defendants to | |
| respond to Plaintiff's complaint will be extended until May 10, 2011. This is the Defendants' | |
| first extension and is without prejudice to a request to any further extension if needed. | |
| 2. Defendant stipulates and agrees that it will not sell Plaintiff's property located at | |
| 2952 Somerset Avenue, Castro Valley, California, before the Court has issued a ruling on its | |
| Motion to Dismiss. | |
| , | OSEPH A. LEPERA |
| | EPERA & ASSOCIATES, PC |
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| B | y: <u>/s/ Joseph A. Lepera</u> JOSEPH A. LEPERA |
| | Attorneys for Plaintiff DIANA ENGEL |
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| B | RIK J. OLSON RIAN L. LEVINE |
| IVI | ORRISON & FOERSTER LLP |
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| B | y: <u>/s/ Brian L. Levine</u> BRIAN L. LEVINE |
| | Attorneys for Defendant CALIFORNIA RECONVEYANCE |
| | COMPANY |
| I, Brian L. Levine, am the ECF User whose ID and password are being used to file this Stipulation Extending Dates; [Proposed] Order. In compliance with General Order 45, X.B., I hereby attest that Joseph A. Lepera has concurred in this filing. | |
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| B | y: <u>/s/ Brian L. Levine</u> BRIAN L. LEVINE |
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| | ttorneys for Defendant |
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| | said relief and communicated to Plaintiff within IT IS HEREBY STIPULATED THAT: 1. Plaintiff and Defendant stipulate respond to Plaintiff's complaint will be extended first extension and is without prejudice to a req 2. Defendant stipulates and agrees 2952 Somerset Avenue, Castro Valley, Califor: Motion to Dismiss. Dated: February 24, 2011 JC Li B Dated: February 24, 2011 E B M J J J J J J J J J J J J J J J J J J |

