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6 Attorneys for Defendant  
 7 WELLS FARGO BANK, N.A., successor  
 by merger with Wells Fargo Bank Southwest, N.A.,  
 8 f/k/a Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB

9  
 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 NADER SHATERIAN,	)	CASE NO. C 11-00920-SC
	)	
13 Plaintiff,	)	[Assigned to the Honorable Judge Samuel Conti]
	)	
14 vs.	)	<b>STIPULATION AND ORDER FOR</b>
	)	<b>CONTINUANCE OF NOVEMBER 29, 2011</b>
15 WELLS FARGO BANK, NATIONAL	)	<b>CASE MANAGEMENT CONFERENCE</b>
16 ASSOCIATION; CAL-WESTERN	)	
17 RECONVEYANCE CORPORATION;	)	
and DOES 1-50, Inclusive	)	Date: to be reset
	)	Time: to be reset
18 Defendants.	)	Courtroom: 1
	)	

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 20  
 21 By this stipulation, the parties to this action request that the Court continue the Case  
 22 Management Conference in this action, currently scheduled for November 29, 2011, for  
 23 approximately 60 days.

24 The reasons for this request are as follows. First, the parties have recently been having  
 25 productive discussions regarding a potential settlement, and would like to direct their energies  
 26 toward those discussions in advance of the Case Management Conference. Second, the parties are  
 27 continuing to analyze the Court's November 7, 2011 Order regarding the motion to dismiss and to  
 28 determine the Order's effect on various case management and settlement issues. Third, defendant

1 Cal-Western Reconveyance Corporation filed a Declaration of Non-Monetary Status prior to the  
2 case being removed to Federal Court. Plaintiff contends that this Declaration was not effective to  
3 make Cal-Western a Nominal Party, because the case was removed to Federal Court before 15 days  
4 had passed from the date the Declaration was filed, and Plaintiff subsequently filed an Objection to  
5 the Declaration of Non-Monetary Status (Doc #15). Cal-Western filed a Reply to this opposition  
6 (Doc. #36), but the Court has not ruled as to whether Cal-Western is or is not a nominal party.  
7 Fourth, Nicole Neff of the Wright Finley firm, counsel for defendant Cal Western, is on her  
8 honeymoon until November 30, and it is desired that she participate in the conference and the  
9 parties' other discussions.

10 **STIPULATION**

11 Plaintiff Nader Shaterian ("Plaintiff") and Defendants Wells Fargo Bank, N.A. and Cal-  
12 Western Reconveyance Corporation, by and through their respective counsel, hereby stipulate and  
13 request this Court continue the Case Management Conference currently scheduled for November  
14 21, 2011 for approximately 60 days, with a corresponding continuance for the filing of a joint Case  
15 Management Statement.

16 Dated: November 21, 2011

ANGLIN, FLEWELLING, RASMUSSEN,  
CAMPBELL & TRYTTEN LLP

17  
18 By: /s/ Viddell Lee Heard  
Viddell Lee Heard  
19 Attorneys for Defendant Wells Fargo  
20 Bank, National Association

21 BLOOMFIELD LAW GROUP, INC.  
A Professional Corporation

22  
23 By: /s/ Neil Jon Bloomfield  
Neil Jon Bloomfield  
24 Attorneys for Plaintiff Nader Shaterian  
25 WRIGHT, FINLAY & ZAK, LLP

26 By: /s/ Nicole K. Neff  
Nicole K. Neff, Esq.  
27 Attorneys for Defendant Cal-Western  
28 Reconveyance Corporation



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**ORDER**

PURSUANT TO STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the Case Management Conference currently scheduled for November 21, 2011 is continued to 2/10, 2012 at ~~9:00~~ <sup>10:00</sup> a.m.

Dated: 11/22/12



1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I  
3 am employed in the City of Pasadena, California; my business address is Anglin, Flewelling,  
4 Rasmussen, Campbell & Trytten LLP, 199 S. Los Robles Avenue, Suite 600, Pasadena,  
California 91101-2459.

5 On the date below, I served a copy of the following documents entitled:

6 **STIPULATION AND ORDER FOR CONTINUANCE OF NOVEMBER 29, 2011**  
7 **CASE MANAGEMENT CONFERENCE**

8 on all interested parties in said case addressed as follows:

9 ***Served Electronically Via The Court's CM/ECF System:***

10 *Counsel for Plaintiff*

*Counsel for Defendant,*

11 Neil Jon Bloomfield, Esq.  
12 Randall L. Hornibrook, Esq.  
13 BLOOMFIELD LAW GROUP, INC.  
14 901 E. St., Ste. 100  
15 San Rafael, CA 94901

CAL-WESTERN RECONVEYANCE  
CORPORATION

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18 Robin Prema Wright, Esq.  
19 Nicole K. Neff, Esq.  
20 WRIGHT, FINLAY & ZAK, LLP  
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23 Tel: 949.477.5050 Fax: 949.477.9200  
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25 [nneff@wrightlegal.net](mailto:nneff@wrightlegal.net)

26  **BY MAIL:** By placing the envelope for collection and mailing following our ordinary  
27 business practices. I am readily familiar with the firm's practice of collecting and processing  
28 correspondence for mailing. On the same day that correspondence is placed for collection and  
mailing, it is deposited in the ordinary course of business with the United States Postal Service in  
Pasadena, California, in sealed envelopes with postage fully thereon.

I declare under penalty of perjury under the laws of the United States of America that the  
foregoing is true and correct. I declare that I am employed in the office of a member of the Bar  
of this Court at whose direction the service was made. This declaration is executed in Pasadena,  
California, on **November 21, 2011**.

26 Christine L. Daniel  
27 (Print name)

/s/ Christine L. Daniel  
(Signature)