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15 Attorney for Plaintiff

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO/OAKLAND DIVISION

18 CAROL ST. JOHN,

19 Plaintiff,

20 vs.

21 WELLS FARGO BANK, N.A.; WACHOVIA  
 22 MORTGAGE, FSB; and all persons unknown  
 23 claiming any legal or equitable right, title,  
 24 estate, lien, or interest in the property described  
 25 in the complaint adverse to Plaintiff's title, or  
 26 any cloud on Plaintiff's title thereto, and DOES  
 27 1-100, inclusive,

28 Defendants.

CASE NO.: CV 11 1409 JCS

Assigned to Magistrate Judge Joseph C. Spero in Courtroom A

**STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 6-1(A))**

Complaint served: 2/22/2011  
 Current Response Date: 3/24/2011  
 New Response Date: 4/11/2011

**TO THE CLERK AND THE HONORABLE MAGISTRATE JUDGE:**

Plaintiff Carol St. John ("Plaintiff") and defendant WACHOVIA MORTGAGE, a division of Wells Fargo Bank, N.A., fka Wachovia Mortgage, FSB, sued herein as "Wells Fargo Bank, N.A. and Wachovia Mortgage, FSB," ("Defendant") present the following stipulation extending

1 the time for Defendant's response to Plaintiff's Complaint.

2 STIPULATION

3 1. On or about February 22, 2011, Plaintiff filed her Complaint in this matter against  
4 Defendant. On February 22, 2011, Plaintiff served Defendant.

5 2. On March 24, 2011, Defendant removed the case to United States District Court.

6 3. Defendant's response to the complaint is therefore due on March 31, 2011.

7 4. The parties have agreed to an extension of eleven (11) days to April 11, 2011 for  
8 Defendant to respond to the Complaint.

9 5. This is the parties' first request for an extension for Defendant to respond to the  
10 complaint.

11 IT IS SO STIPULATED.

12 Dated: March 31, 2011

ANGLIN, FLEWELLING, RASMUSSEN,  
13 CAMPBELL & TRYTTEN LLP

14 By: /s/Raymond M. Collins  
15 Raymond M. Collins  
rcollins@afrc.com

16 Attorneys for Defendant  
17 Wachovia Mortgage, a division of Wells Fargo  
18 Bank, N.A., formerly known as Wachovia  
19 Mortgage, FSB, formerly known as World  
Savings Bank, FSB

20 Dated: March 31, 2011

LAW OFFICES OF ART HOOMIRATANA

21 By: /s/Antoinette M. Marino  
22 Antoinette M. Marino  
amarino@realestatelawcenter.org

23 Attorney for Plaintiff  
24 Carol St. John

25 Dated: April 1, 2011



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**CERTIFICATE OF SERVICE**

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

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

**Stipulation to Extend Time to Respond to Initial Complaint By Not More than 30 Days (L.R. 6-1(a))**

on all interested parties in said case addressed as follows:

**Served by Other Means:**

*Attorneys for Plaintiffs:*  
Art Hoomiratana  
Antoinette Marino  
Law Offices of Art Hoomiratana  
750 East Green Street, Suite 33  
Pasadena, California 91101  
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**BY MAIL:** By placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's practice of collecting and processing 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.

**FEDERAL:** 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 March 31, 2011.

\_\_\_\_\_  
Mark Betti  
(Print Name)

\_\_\_\_\_  
*Mark Betti*  
(Signature of Declarant)