1 2 3 4 5 6 7 8	BRYAN CAVE LLP Robert A. Padway, California Bar No. 48439 Deborah A. Goldfarb, California Bar No. 24194 Nadia M. Bishop, California Bar No. 182995 2 Embarcadero Center, Suite 1410 San Francisco, CA 94111 Telephone: (415) 675-3400 Facsimile: (415) 675-3434 Email: robert.padway@bryancave.com	
10	UNITED STATES DISTRICT COURT	
11	NORTHERN DISTRICT OF CALIFORNIA	
12		
13	MEHDI RAVAN and ALI RAVAN,	Case No. 3:11-CV-02371 EMC
. 14	Plaintiffs,	JOINT STIPULATION EXTENDING
15	v.	DEFENDANTS' TIME TO RESPOND TO COMPLAINT ; ORDER
16 17 18	AMERICAN MORTGAGE EXPRESS CORP; BANK OF AMERICA HOME LOANS SERVICING, L.P.; BANK OF AMERICA CORPORATION; and DOES 1- 100, inclusive,	[L.R. 6-1(a)]
19	Defendants.	
20	·	
21		
. 22		
23		
24		
25		
26		
27		
28		

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

STIPULATION

Defendants BAC Home Loans Servicing, L.P. and Bank of America Corporation. ("Defendants"), and Plaintiffs Mehdi Ravan and Ali Ravan ("Plaintiffs"), by and through their counsel of record, hereby stipulate and agree as follows:

- Defendant BAC Home Loans Servicing, L.P. removed this matter from Alameda County Superior Court on May 13, 2011.
- After removal to federal court, Defendants have seven (7) days to respond to Plaintiffs' Complaint. However, Plaintiffs and Defendants are in the process of discussing the informal resolution of this matter.
- 3. In order to continue the current settlement discussions, reduce cost of litigation for both parties, and potentially unburden the Court's docket, Plaintiffs grant Defendants an extension to respond to their Complaint. Thus, instead of responding to the Complaint on May 20, 2011 (seven days after removal to federal court), the parties agree that Defendants' time to file and serve their response to the Complaint is extended up to and including August 17, 2011. No trustee sale will be issued prior to this date. August 17, 2011 is also the parties last day to file a Rule 26(f) report, in advance of the Initial Case Management Conference currently set for August 24, 2011. Thus, this stipulation will not alter any pre-existing court event or deadline, and is submitted without a court order pursuant to Local Rule 6-1(a).
- The stipulation will not result in prejudice to any party and its impact on judicial 4. proceedings is not expected to be significant.
- 5. Nothing in this stipulation shall constitute a waiver of any arguments or defenses that Defendants or Plaintiffs may wish to assert in their pleadings, all of which are expressly reserved.

24

25

26

27

28

IT IS SO STIPULATED.

Dated: May 15, 2011

Dated: May 20, 2011

2

1

3

5

6

<u>'</u>

8 9

10

11 12

13

14

16

15

17

18

19

20

21

22

23

2425

26

27

28

MATRIX LAW FIRM, APC

Reuben D. Nathan

By:\

Reaben D. Nathan

Attorney for Plaintiffs

MEHDI RAVAN and ALI RAVAN

BRYAN CAVE LLP

Robert A. Padway Deborah A. Goldfarb Nadia M. Bishop

By:

Nadia M. Bishop

Attorneys for Defendants

BAC HOME LOANS SERVICING, L.P., AND BANK OF AMERICA CORPORATION

