Omega et al v. Wells Fargo & Co

. Well	Fargo & Co.,		Doc. 8	
	Case3:11-cv-02621-JCS Document7	Filed06/08/11 Page1 of 4	1	
1	Lynette Gridiron Winston (#151003)			
2	lwinston@afrct.com Melissa M. Coyle (#232775)			
3	mcoyle@afrct.com Anglin, Flewelling, Rasmussen,			
4	Campbell & Trytten LLP 199 S. Los Robles Avenue, Suite 600			
5	Pasadena, California 91101-2459 Tel: (626) 535-1900			
6	Fax: (626) 577-7764			
7	Attorneys for Defendant Wachovia Mortgage, a division of Wells Fargo Bank, N.A., fraudulently joined and sued as			
8	"Wells Fargo & Co." ("Wells Fargo")			
9				
10	UNITED STATES DISTRICT COURT			
11	NORTHERN DISTRICT OF CALIFORNIA			
12				
13	FLORENCIO L. OMEGA and JUANITA T.	Case No.: 3:11-CV-02621-J	CS	
14	OMEGA, Plaintiffs,	[Assigned to the Honorable]	oseph C. Spero,	
15	VS.	Courtroom]		
16 17	WELLS FARGO & CO.; and DOES 1-250, inclusive,	STIPULATION TO EXTE RESPOND TO INITIAL C NOT MORE THAN 30 DA	OMPLAINT BY	
18		Complaint Served:	May 16, 2011	
19	Defendants.	Date Removed:	June 1, 2011	
20		Current Response Date: New Response Date:	June 8, 2011 June 22, 2011	
21				
22	TO THE CLERK AND THE HONORABLE JOSEPH C. SPERO, DISTRICT COURT			
23	MAGISTRATE:			
24	Plaintiffs Florencio L. Omega and Juan	ita T. Omega ("Plaintiffs") and	defendant Wells	
25	Fargo Bank, N.A. successor by merger with Wells Fargo Bank Southwest, N.A., formerly			
26	known as Wachovia Mortgage, FSB, formerly known as World Savings Bank, FSB and			
27	fraudulently joined and sued as "Wells Fargo & Co." ("Wells Fargo") present the following			
28	stipulation extending the time for Wells Fargo	stipulation extending the time for Wells Fargo to respond to plaintiffs' Complaint.		
	*95451/000889/00170109-1	1 STIPULATION TO	NO.: C11-02621-JCS) EXTEND TIME TO ITIAL COMPLAINT	

Dockets.Justia.com

	Case3:11-cv-02621-JCS Docu	ument7 Filed06/08/11 Page2 of 4		
1	STIPULATION			
2	1. On or about May 13, 202	11, plaintiffs filed their Complaint against Wells Fargo.		
3	Plaintiffs personally served Wells Fargo on May 16, 2011.			
4	2. On or about June 1, 2011, Wells Fargo removed the case to the United States			
5	District Court, Northern District of California.			
6	3. Wells Fargo's response t	to the Complaint is due on June 8, 2011.		
7	4. The parties have agreed	to an extension of two weeks, until June 22, 2011, for		
8	Wells Fargo to respond to the Complaint.			
9	5. This is the parties' first r	request for an extension for Wells Fargo to respond to the		
10	Complaint.			
11	IT IS SO STIPULATED.			
12		Despectfully submitted		
13		Respectfully submitted,		
14	Dated: June 8, 2011	ANGLIN, FLEWELLING, RASMUSSEN, CAMPBELL & TRYTTEN LLP		
15		By: /s/ Melissa M. Coyle		
16		Melissa M. Coyle mcoyle@afrct.com		
17		Attorneys for Defendant		
18		Wachovia Mortgage, a division of Wells Fargo Bank, N.A., fraudulently joined and sued as		
19		"Wells Fargo & Co."		
20	Datadi Juna 8, 2011			
21	Dated: June 8, 2011	HOLLAND LAW FIRM		
22		DISBRICS Cometria Cooper		
23	STATE	Attorneys for Naintiffs Florencio L. Omega and		
24	E -	T ····································		
25	Dated: June 9, 2011	O ORDERED		
26		I.		
27	Z Judg	e Joseph C. Spero		
28				
	*95451/000889/00170109-1	ISTRICT OF CASE NO.: C11-02621-JCS STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT		

	Case3:11-cv-02621-JCS Document7 Filed06/08/11 Page3 of 4			
1	ATTESTATION PURSUANT TO GENERAL ORDER 45			
2				
3	I, Melissa M. Coyle, attest that concurrence in the filing of this document has been obtained from each of the signatories. I declare under penalty of perjury under the laws of the			
4	United States of America that the foregoing is true and correct. Executed this 8 th day of June, 2011.			
5				
6				
7	/s/ Melissa M. Coyle			
8	mcoyle@afrct.com			
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
	*95451/000889/00170109-1 3 CASE NO.: C11-02621-JCS STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT			

	Case3:11-cv-02621-JCS Document7 Filed06/08/11 Page4 of 4			
1	CERTIFICATE OF SERVICE			
2	I, the undersigned, declare that I am over the age of 18 and am not a party to this			
3	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,			
4	Pasadena, California 91101-2459.			
5	On the date below, I served a copy of the following document(s):			
6 7	STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 6-1(A))			
8	on all interested parties in said case addressed as follows:			
9	Served Electronically via Court's CM/ECF System:			
10				
11	Attorneys for Plaintiff			
12	George Holland, Jr., Esq.			
13	Holland Law Firm 1970 Broadway			
14	Suite 1030 Oakland, CA 94612			
15	Tel: 510.465.4100			
16				
17	<u>FEDERAL</u> : I declare under penalty of perjury under the laws of the United States of			
18	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			
19	executed in Pasadena, California, on June 8, 2011.			
20				
21	Teresa L. Zunino/s/ Teresa L. Zunino(Print name)(Signature)			
22				
23				
24				
25 25				
26				
27				
28				
	*95451/000889/00170109-1 1 CASE NO. C11-02621-JCS CERTIFICATE OF SERVICE			