

1 MICHAEL NG (237915)
2 KELLY A. CORCORAN (260268)
3 **KERR & WAGSTAFFE LLP**
4 100 Spear Street, Suite 1800
5 San Francisco, CA 94105-1528
6 Telephone: (415) 371-8500
7 Fax: (415) 371-0500

8 STEVEN A. SKALET (*pro hac vice*)
9 CRAIG L. BRISKIN (*pro hac vice*)
10 **MEHRI & SKALET, PLLC**
11 1250 Connecticut Avenue NW, Suite 300
12 Washington, D.C. 20036
13 Telephone: (202) 822-5100
14 Fax: (202) 822-4997

15 JEAN CONSTANTINE-DAVIS (*pro hac vice*)
16 **AARP FOUNDATION LITIGATION**
17 601 E Street NW
18 Washington, D.C. 20049
19 Telephone: (202) 434-2060
20 Fax: (202) 434-6424

21 Attorneys for Plaintiff and the Putative Class

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 SAN FRANCISCO DIVISION

25 ROBERT CHANDLER, AS
26 REPRESENTATIVE OF THE ESTATE OF
27 ROSEMARY S. CHANDLER, individually
28 and on behalf of all others similarly situated,

Plaintiff,

vs.

29 WELL'S FARGO BANK, N.A., a California
30 corporation,

31 *and*

32 FEDERAL NATIONAL MORTGAGE
33 ASSOCIATION a/k/a FANNIE MAE,

34 Defendants.

35 Case No. 3:11-cv-03831-SC

36 **CLASS ACTION**

37 **STIPULATION AND [PROPOSED]
38 ORDER FURTHER EXTENDING
39 DEADLINE TO FILE REPLY TO
40 DEFENDANTS' MOTION TO DISMISS
41 AND ADVANCING CASE
42 MANAGEMENT CONFERENCE**

STIPULATION

WHEREAS Plaintiff filed his Opposition to Defendants' Motion to Dismiss on November 1, 2011;

WHEREAS Defendants desire additional time to reply to Plaintiff's opposition;

WHEREAS Defendants' Motion to Dismiss is set for hearing on January 13, 2012;

WHEREAS the initial case management conference is set for February 10, 2012;

WHEREAS for the convenience of the Court and the parties, and to preserve resources;

NOW THEREFORE, the parties hereby stipulate and agree as follows:

9 1. Defendant shall have until November 22, 2011 to file their Reply to Plaintiff's
10 Opposition to Defendants' Motion to Dismiss;
11 2. The initial case management conference shall be advanced to January 13, 2012, to
12 coincide with the Motion to Dismiss hearing.

14 DATED: November 14, 2011

KERR & WAGSTAFFE LLP

MEHRI & SKALET, PLLC

AARP FOUNDATION LITIGATION

By /s/ Kelly A. Corcoran
KELLY A. CORCORAN

Attorneys for Plaintiff and the Putative Class

33 | PAGED: November 14, 2011

SEVERSON & WERSON

By /s/ REBECCA S. SAE LAO
MARK D. LONERGAN
JOHN B. SULLIVAN
REBECCA S. SAE LAO

Attorneys for Defendants
WELLS FARGO BANK, N.A. and
FEDERAL NATIONAL MORTGAGE
ASSOCIATION a/k/a FANNIE MAE

~~PROPOSED~~ ORDER

Having considered the stipulation of counsel, and good cause appearing therefore, the extensions are hereby GRANTED.

1. Defendant shall have until November 22, 2011 to file their Reply to Plaintiff's Opposition to Defendants' Motion to Dismiss;

2. The initial case management conference shall be advanced to January 13, 2012, to coincide with the Motion to Dismiss hearing.

IT IS SO ORDERED.

Dated: 11/15/11



1 I, Kelly A. Corcoran, am the ECF User whose ID and password are being used to file this
2 **STIPULATION AND [PROPOSED] ORDER FURTHER EXTENDING DEADLINE TO**
3 **FILE REPLY TO DEFENDANTS' MOTION TO DISMISS AND ADVANCING CASE**
4 **MANAGEMENT CONFERENCE.** In compliance with General Order 45, X.B., I hereby
5 attest that Rebecca S. Saelao, counsel for Defendants has concurred in this filing.

6
7 DATED: November 14, 2011

KERR & WAGSTAFFE LLP

8
9 By _____/s/
10 KELLY A. CORCORAN

11 Attorneys for Plaintiff and the Putative Class
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28