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E-Filed 11/23/11 **BRYAN CAVE LLP** C. Scott Greene, California Bar Number 277445 Elizabeth V. Coleman, California Bar Number 209430 Two Embarcadero Center, Suite 1410 San Francisco, CA 94111-3907 Telephone: (415) 675-3400 Facsimile: (415) 675-3434 scott.greene@bryancave.com E-mail: colemane2@bryancave.com 5 6 BRYAN CAVE LLP Sean Muntz, California Bar No. 223549 3161 Michelson Drive, Suite 1500 Irvine, California 92612-4414 (949) 223-7000 Telephone: (949) 223-7100 9 Facsimile: sean.muntz@bryancave.com Email: 10 Attorneys for Defendants JP MORGAN CHASE BANK, N.A., as acquirer of certain 11 assets and liabilities of Washington Mutual Bank from the Federal Deposit Insurance Corporation, as 12 Receiver for Washington Mutual Bank and U.S. BANK NATIONAL ASSOCIATION, successor to Bank of America, 13 as Trustee for WA Mutual Mortgage Pass-Through Certificates WMalt Series 2007-OCT Trust 14 15 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA 18 Case No. CV 11 – 04439 PSG 19 VANNA LEN, an individual, 20 Plaintiff, JOINT STIPULATION TO STAY v. 21 PROCEEDINGS FOR SIXTY DAYS AND JPMORGAN CHASE, NA F/K/A **FURTHER EXTEND DEFENDANTS'** 22 WASHINGTON MUTUAL NA; BANK OF TIME TO FILE A RESPONSE TO AMERICA, N.A. F/K/A LASALLE BANK, PLAINTIFF'S COMPLAINT; 23 NA AS TRÚSTEE FOR WA MUTUAL [PROPOSED] ORDER MORTGAGE PASS-THROUGH 24 **CERTIFICATES WMALT SERIES 2007-**Date Action Filed: September 7, 2011 OC2 TRUST; and DOES 1 through 10, 25 inclusive, Trial Date: None Set Defendants. 26 27 28

C022167/0323173/39047.1

STIPULATION

Plaintiff VANNA LEN ("Plaintiff") and Defendants JP MORGAN CHASE BANK, N.A,
as acquirer of certain assets and liabilities of WASHINGTON MUTUAL BANK from the Federal
Deposit Insurance Corporation, as Receiver for Washington Mutual Bank ("JPMORGAN") and
U.S. BANK NATIONAL ASSOCIATION, successor in interest to Bank of America, N.A. F/K/A
La Salle Bank, NA, as Trustee for WA Mutual Mortgage Pass-Through Certificates WMalt Series
2007-OC2 Trust ("USBANK) (collectively "Defendants") by and through their respective counsel
STIPULATE and AGREE as follows:

WHEREAS, Plaintiff in this action filed a verified complaint on September 7, 2011;
WHEREAS, a Case Management Conference is presently scheduled for December 1,
2011, at 10:00 a.m.;

WHEREAS, the parties are working diligently in the hopes that this dispute can be resolved, and do not wish to incur any unnecessary expenses or expend judicial resources unnecessarily;

WHEREAS, Plaintiff and JPMORGAN have only once previously requested an extension of time to November 4, 2011, for JPMORGAN to file a response to the complaint;

WHEREAS, the parties have agreed to stay all proceedings in this action for sixty (60) days, until January 21, 2012, and grant an additional 60 day extension of time for Defendants to file a response to the Complaint;

WHEREAS, the stay and extension of time requested herein will not result in prejudice to any parties or to the Court;

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1	IT IS SO STIPULATED by Plaintiff and Defendants, by and through their respective
2	counsel, and the Court is respectfully requested to order that all proceedings in this action shall be
	stayed until January 21, 2012, and Defendants' response to Plaintiff's Complaint will be due on
3	January 21, 2012.
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5	Respectfully submitted,
6	Dated: November 22, 2011 PROSPER LAW GROUP LLC.
7	/S/ Michael Thompson
8	Michael Thompson Attorneys for Plaintiff VANNA LEN
	Attorneys for Flamuii VAINNA EEN
9	Dated: November 22, 2011 BRYAN CAVE LLP
10	
11	/S/ Elizabeth V. Coleman
	Elizabeth V. Coleman
12	Attorneys for Defendant JP MORGAN CHASE
13	BANK, NA, as acquirer of certain assets and liabilities of WASHINGTON MUTUAL BANK NA
14	from the FDIC, as Receiver for Washington Mutual
	Bank, N.A and U.S. BANK NATIONAL
15	ASSOCIATION, successor in interest to Bank of America, N.A. F/K/A La Salle Bank, NA, as Trustee
16	for WA Mutual Mortgage Pass-Through Certificates
17	WMalt Series 2007-OC2 Trust
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19	ATTESTATION PURSUANT TO GENERAL ORDER 45
20	I, Elizabeth V. Coleman, attest that concurrence in the filing of this document has been
21	obtained from each of the signatories. I declare under penalty of perjury under the laws of the
22	
23	United States of America that the foregoing is true and correct. Executed on November 22, 2011,
	at San Francisco, California.
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25	/S/ Elizabeth V. Coleman
26	Elizabeth V. Coleman
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PROPOSEDI ORDER

Having reviewed the above Stipulation of the parties and good cause appearing therefore. IT IS HEREBY ORDERED that all proceedings in this action shall be stayed until January 21, 2012, Defendants J.P. MORGAN CHASE BANK, N.A., as acquirer of certain assets and liabilities of WASHINGTON MUTUAL BANK from the Federal Deposit Insurance Corporation, as Receiver for Washington Mutual Bank ("JPMORGAN") and U.S. BANK NATIONAL ASSOCIATION as successor in interest to Bank of America, N.A. F/K/A La Salle Bank, NA as Trustee for WA Mutual Mortgage Pass-Through Certificates WMalt Series 2007-OC2 Trust ("USBANK) shall have up to and including January 21, 2012 to respond to Plaintiff's Complaint.

Dated: 11/23/11

Judge of the U.S. District Court, Northern District

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