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RICHARD W. WELKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 GAIMS, WEIL, WEST & EPSTEIN, LLP
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6 *Attorneys for Defendants Dewey & LeBoeuf LLP,
7 Christopher DiAngelo and Roxana Bargo*

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

11 COMUNITY COLLECTORS LLC,
12 GWENDOLYNN J. TYLER 2006
13 LIVING TRUST, W. DARRYL FRY, an
14 individual,

14 Plaintiffs,

15 y.
16 MORTGAGE ELECTRONIC
17 REGISTRATION SERVICES, INC.;
18 TERWIN ADVISORS L.L.C. D/B/A/
19 THE WINTER GROUP; DEWEY &
20 LEBEOUF L.L.P.; CHRISTOPHER
21 DIANGELO; ROXANA BARGOZ;
22 THE BANK OF NEW YORK
23 MELLON; WILMINGTON TRUST
24 COMPANY; SPECIALIZED LOAN
25 SERVICING L.L.C.; DEUTSCHE
26 BANK AG; OSERBERG ASSET
27 MANAGEMENT LLC,
28

23 Defendants.

Case No. CV 11 4777

[Assigned to Hon. Edward M. Chen]

Complaint Filed: December 26, 2011

DECLARATION OF STEVEN S. DAVIS IN
SUPPORT OF JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND TIME
TO RESPOND TO THE COMPLAINT [Local
Rule 6.1(a), (b)]

DECLARATION OF STEVEN S. DAVIS

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BY FAX

1 I, Steven S. Davis, declare:

2 1. I am an attorney at law licensed to practice before all courts of the State of
3 California. I am a member of Gaims, Weil, West & Epstein, LLP, attorneys of record for
4 defendants Dewey & LeBoeuf L.L.P.; Christopher DiAngelo; and Roxana Bargo
5 (collectively, "Dewey") in this action. I have personal knowledge of the following facts.
6 If called upon to testify as a witness, I could and would testify competently to these
7 facts under oath.

8 2. Plaintiffs and defendants Dewey, Specialized Loan Servicing L.L.C.
9 ("SLS"), Deutsche Bank AG ("Deutsche Bank") and Oseberg Asset Management LLC
10 ("Oseberg"), have previously agreed and stipulated that defendants shall respond to
11 the complaint on various dates ranging from February 29, 2012 to March 12, 2012.

12 3. On February 27, 2012, I requested that plaintiffs' counsel Ted White agree
13 that all appearing defendants may answer or otherwise serve a response to the
14 complaint on the same date, namely March 12, 2012, and he graciously agreed. I so
15 advised counsel for the other defendants who have appeared in this case.

16 4. Counsel for SLS, Deutsche Bank and Wilmington Trust Company have
17 advised me that they wish to join in a Stipulation that so provides. Accordingly, I
18 prepared such a Stipulation and [Proposed] Order that so provides and which is signed
19 by the interested parties' counsel and attached to this declaration.

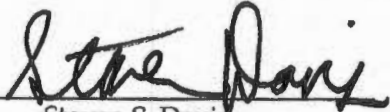
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5. I respectfully request the Court on behalf of my clients Dewey, DiAngelo and Bargo and the other parties whose counsel have signed the attached Stipulation that the Court approve and enter it as the Court's Order.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration is executed on February 27, 2012, at Los Angeles, California.


Steven S. Davis

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*Attorneys for Defendants Dewey & LeBoeuf LLP,
Christopher DiAngelo and Roxana Bargo*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

COMMUNITY COLLECTORS LLC,
GWENDOLYNN J. TYLER 2006
LIVING TRUST, W. DARRYL FRY, an
individual,

Plaintiffs,

v.

MORTGAGE ELECTRONIC
REGISTRATION SERVICES, INC.;
TERWIN ADVISORS L.L.C. D/B/A/
THE WINTER GROUP; DEWEY &
LEBOEUF L.L.P.; CHRISTOPHER
DIANGELO; ROXANA BARGOZ;
THE BANK OF NEW YORK
MELLON; WILMINGTON TRUST
COMPANY; SPECIALIZED LOAN
SERVICING L.L.C.; DEUTSCHE
BANK AG; OSERBERG ASSET
MANAGEMENT LLC,

Defendants.

Case No. CV 11 4777

[Assigned to Hon. Edward M. Chen]

Complaint Filed: December 26, 2011

**JOINT STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO RESPOND
TO THE COMPLAINT [Local Rule 6.1(a), (b)]**

Case Management Conference: May 18, 2012

1 WHEREAS on January 16, 2012, plaintiffs COMUNITY COLLECTORS LLC,
2 GWENDOLYNN J. TYLER 2006 LIVING TRUST, and W. DARRYL FRY ("Plaintiffs")
3 served the summons and complaint on defendants DEWEY & LEBOEUF L.L.P.;
4 CHRISTOPHER DIANGELO; and ROXANA BARGOZ (collectively, "Dewey"), and
5 Dewey's response to the Complaint is currently due on February 29, 2012;

6 WHEREAS on January 18, 2012, Plaintiffs served the summons and complaint on
7 defendant SPECIALIZED LOAN SERVICING L.L.C. ("SLS"), and SLS's response to the
8 Complaint is currently due on February 29, 2012;

9 WHEREAS on January 18, 2012, Plaintiffs served the summons and complaint on
10 defendant DEUTSCHE BANK AG ("Deutsche Bank"), and Deutsche Bank's response to
11 the Complaint is currently due on March 6, 2012;

12 WHEREAS on January 19, 2012, Plaintiffs served the summons and complaint on
13 defendant OSEBERG ASSET MANAGEMENT LLC ("Oseberg"), and Oseberg's
14 response to the Complaint is currently due on March 12, 2012;

15 WHEREAS Dewey, SLS, Deutsche Bank, and Oseberg all have yet to answer or
16 otherwise respond to the Complaint;

17 WHEREAS on February 13, 2012, plaintiffs and defendants filed and the Court
18 entered a joint stipulation and Order continuing the Case Management Conference in
19 this case from February 17, 2012 to May 18, 2012 that so recites the foregoing;

20 WHEREAS plaintiffs and defendants Dewey, SLS, Deutsche Bank and
21 Wilmington Trust Company ("Wilmington") ("the Stipulating Parties") believe it will
22 promote efficiency and convenience for the Court and all parties to have all of the
23 foregoing defendants' responses to the complaint due on the same date; and

24 WHEREAS the Stipulating Parties have entered into this Stipulation, subject to
25 the Court's approval, to so provide.

26 NOW, THEREFORE, plaintiffs and defendants Dewey, SLS, Deutsche Bank and
27 Wilmington, through their respective counsel of record, stipulate and agree as follows:
28

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Defendants Dewey & LeBoeuf LLP, Christopher DiAngelo, Roxana Bargoz,
Specialized Loan Servicing L.L.C., Deutsche Bank AG and Wilmington Trust Company
shall have to and including March 12, 2012, to answer or make any motion in response
to the Complaint.

SO STIPULATED.

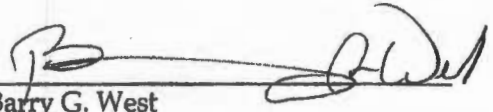
Dated: February __, 2012

THE WHITE LAW FIRM

By: _____
Edward K White III
Attorneys for Plaintiffs
COMMUNITY COLLECTORS LLC,
GWENDOLYNN J. TYLER 2006 LIVING
TRUST, and W. DARRYL FRY

Dated: February 27, 2012

GAIMS, WEIL, WEST & EPSTEIN, LLP

By:  _____
Barry G. West
Attorneys for Defendants
DEWEY & LEBOEUF L.L.P.; CHRISTOPHER
DIANGELO; and ROXANA BARGOZ

Dated: February __, 2012

PALMER, LOMBARDI & DONOHUE LLP

By: _____
Brett D. Watson
Attorneys for Defendant
SPECIALIZED LOAN SERVICING L.L.C. and
WILMINGTON TRUST COMPANY

GAINS, WEIL, WEST & ERSTEIN, LLP
ATTORNEYS AT LAW
1825 CENTURY PARK EAST, 18th FLOOR, LOS ANGELES, CALIFORNIA 90067-2513

1 Defendants Dewey & LeBoeuf LLP, Christopher DiAngelo, Roxana Bargo,
2 Specialized Loan Servicing L.L.C., Deutsche Bank AG and Wilmington Trust Company
3 shall have to and including March 12, 2012, to answer or make any motion in response
4 to the Complaint.

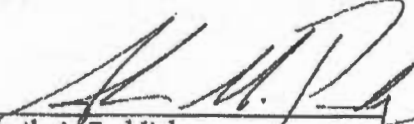
5 SO STIPULATED.

6 Dated: February 28 2012	MILLER & WRUBEL P.C. 7 8 BY: <u>Claire Huene</u> Charles R. Jacob III Claire L. Huene Attorneys For Defendants SPECIALIZED LOAN SERVICING LLC (admitted pro hac) and WILMINGTON TRUST COMPANY (pro hac pending)
12 Dated: February 28 2012	PALMER, LOMBARDI & DONOHUE LLP 14 BY: <u>Brett D. Watson</u> Brett D. Watson Attorneys For Defendants SPECIALIZED LOAN SERVICING LLC and WILMINGTON TRUST COMPANY
19 Dated: February 28 2012	THE WHITE LAW FIRM 21 BY: <u>Edward K. White III</u> Edward K White III Attorneys for Plaintiffs COMMUNITY COLLECTORS LLC, GWENDOLYNN J. TYLER 2006 LIVING TRUST, and W. DARRYL FRY

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Dated: February 21, 2012

MORGAN, LEWIS & BOCKIUS LLP

By: 
Elizabeth A. Frohlich
Andrew M. Purdy
Attorneys for Defendant
DEUTSCHE BANK AG

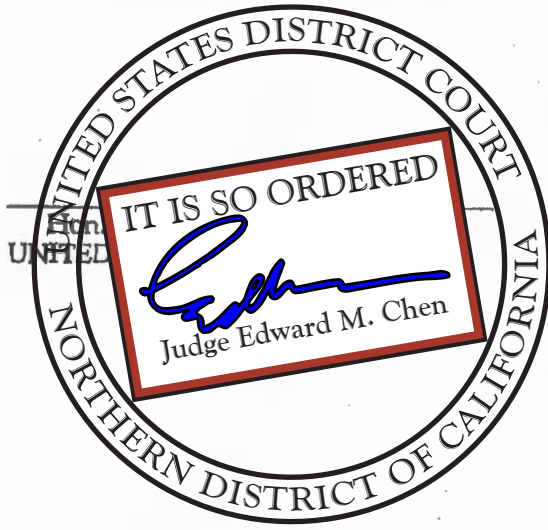
ORDER

Pursuant to the stipulation, and GOOD CAUSE appearing therefor, the time for defendants Dewey, DiAngelo, Bargo, SLS, Wilmington and Deutsche Bank to answer or make any motion in response to the Complaint is hereby continued to March 12, 2012.

IT IS SO ORDERED.

March 1, 2012

Dated: February 21, 2012



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