

1 MARK L. BLOCK (SBN 115457)
 mblock@wargofrench.com
 2 LAURIE H. SELKOWITZ (SBN 274619)
 lselkowitz@wargofrench.com
 3 WARGO & FRENCH LLP
 4 515 S. Flower Street, 36th Floor
 5 Los Angeles, California 90071
 Telephone: (310) 853-6300
 6 Facsimile: (310) 553-5317

7
 8 Attorneys for Defendant
 JPMORGAN CHASE BANK, N.A.
 9

10
 11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**
 13

14 RODRIGO MOLINA, an individual,

15
 16 Plaintiff,

17 vs.

18 JP MORGAN CHASE BANK, N.A. a
 19 corporation and DOES 1 through 50,
 20 inclusive,

21 Defendants.
 22
 23

Case No. C 11-06158 JCS

**STIPULATION TO EXTEND TIME
 TO RESPOND TO INITIAL
 COMPLAINT (L.R. 6-1(A))**

Action removed: December 7, 2011
 Current response date: December 14,
 2011

New response date: January 13, 2012

Hon. Joseph C. Spero

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
24
25
26
27
28

RECITALS

1. Plaintiff Rodrigo Molina (“Plaintiff”) filed the instant Complaint against Defendant JPMorgan Chase Bank, N.A. (“Chase”) on November 2, 2011 in the Superior Court of the State of California in and for the County of San Mateo, Civil Action Number CIV509473 (“State Action”). The Complaint alleges causes of action for violation of California Business and Professions Code section 17200, violation of Real Estate Settlement Procedures Act of 1974 (12 U.S.C. § 2601), violation of Truth in Lending Act (12 CFR § 226), fraud, fraud in the inducement, unfair business practices, injunctive relief, and other equitable relief.

2. Chase was served with Plaintiff’s Complaint on November 8, 2011.

3. On December 7, 2011, Chase timely removed the State Action to this Court pursuant to 28 U.S.C. §§ 1331 and 1332.

4. On December 8, 2011, Chase’s counsel called Plaintiff’s counsel to discuss the Complaint and the upcoming deadline to file a responsive pleading. Chase’s counsel and Plaintiff’s counsel discussed the causes of action raised in the Complaint and agreed that an extension of time for Chase to respond to Plaintiff’s Complaint would benefit the parties by allowing Chase to properly evaluate Plaintiff’s claims and to gather certain documents necessary for the investigation of Plaintiff’s allegations and by allowing the parties to engage in discussions on how to best resolve their dispute.

5. Chase’s counsel and Plaintiff’s counsel agreed to extend the deadline for Chase to respond to Plaintiff’s Complaint by thirty days, from December 14, 2011 to January 13, 2012.

STIPULATION

1. Plaintiff and Chase desire to continue the responsive pleading deadline to January 13, 2012, so they may focus their energies on properly understanding the issues in this case and/or resolving the action. This extension of time shall not alter

1 the date of any event or any deadline already fixed by Court order, and under Local
2 Rule 6-1(a), need not be approved by the Court.

3 2. The Parties stipulate that:

4 a. Chase shall have until January 13, 2012, to respond to Plaintiff's
5 Complaint.

6
7 DATED: December 9, 2011

WARGO & FRENCH LLP

8

9

By: /s/ Laurie H. Selkowitz

10

MARK L. BLOCK
LAURIE H. SELKOWITZ

11

12

Attorneys for Defendant
JPMorgan Chase Bank, N.A.

13

14

15 Dated: December 9, 2011

THE LAW OFFICE OF WENDELL J.
JONES

16

17

18

By: /s/ Wendell J. Jones / LHS
WENDELL J. JONES

19

20

Attorney for Plaintiff
Rodrigo Molina

21

22 Dated: 12/13/11



23

24

25

26

27

28

PROOF OF SERVICE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

I am employed in the County of Los Angeles, State of California; I am over the age of 18 and not a party to the within action; my business address is 1901 Avenue of the Stars, 11th Floor, Los Angeles, California 90067.

On **December 9, 2011**, I served the foregoing document(s) described as **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT (L.R. 6-1(A))** on the interested parties to this action by delivering a copy thereof in a sealed envelope addressed to each of said interested parties at the following address(es):
SEE ATTACHED LIST

(BY MAIL) I am readily familiar with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. This correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business at our Firm's office address in Los Angeles, California. Service made pursuant to this paragraph, upon motion of a party served, shall be presumed invalid if the postal cancellation date of postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.

(BY ELECTRONIC SERVICE) by causing the foregoing document(s) to be electronically filed using the Court's Electronic Filing System which constitutes service of the filed document(s) on the individual(s) listed on the attached mailing list.

(BY E-MAIL SERVICE) I caused such document to be delivered electronically via e-mail to the e-mail address of the addressee(s) set forth in the attached service list.

(BY FACSIMILE) I caused the above-referenced document to be transmitted to the interested parties via facsimile transmission to the fax number(s) as stated on the attached service list.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the above named addressee(s).

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) 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. I declare under penalty of perjury that the above is true and correct.

Executed on **December 9, 2011**, at Los Angeles, California.

/s/ Laurie H. Selkowitz _____

Laurie H. Selkowitz

SERVICE LIST

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Wendell J. Jones
The Law Office of Wendell J. Jones
1901 S. Bascom Avenue, Suite 333
Campbell, California 95008
Telephone: (408) 371-7589
E-mail: wendell@wendelljoneslaw.com
Counsel for Plaintiff