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Attorneys for Defendants
 8 WELLS FARGO BANK, N.A. and
 WELLS FARGO INSURANCE SERVICES
 9 USA, INC.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12

13 DOUGLAS CORBIN, individually and on
 14 behalf of all others similarly situated,

15 Plaintiff,

16 vs.

17 WELLS FARGO BANK, N.A. and WELLS
 18 FARGO INSURANCE SERVICES USA,
 INC.,

19 Defendants.
 20

Case No. 3:13-cv-1353-JCS

**JOINT STIPULATION TO STAY CASE;
 [PROPOSED] ORDER**

1 Plaintiff Douglas Corbin (“Plaintiff”) and Defendants Wells Fargo Bank, N.A., and Wells
2 Fargo Insurance Services USA, Inc., (“Defendants” or collectively, “Wells Fargo”) through their
3 attorneys of record, hereby agree and stipulate as follows:

4 A. On February 11, 2014, this Court entered Orders staying two related cases. *See*
5 *McKenzie v. Wells Fargo Bank, N.A.*, Case No. 3:11-cv-04965-JCS, Dkt. 234; *Leghorn v. Wells*
6 *Fargo Bank, N.A.*, Case No. 3:13-cv-000708-JCS, Dkt. 16. The stays in *McKenzie* and *Leghorn*,
7 which were agreed to by the parties in those cases, were based upon the settlement in principle of
8 another pending action involving Wells Fargo’s lender placed insurance (“LPI”) program, *Fladell*
9 *v. Wells Fargo Bank, N.A., et al.*, S.D. Fla. Case No. 1:13-cv-60721-FAM.

10 B. This case, like *McKenzie* and *Leghorn*, also involves Wells Fargo’s LPI program.
11 Both *McKenzie* and *Leghorn* have been related to this case by Court order. See Dkt. 13-14.
12 Certain deadlines, including those for filing a motion for class certification, are approaching. See
13 Dkt. 36.

14 C. The parties believe it is in the best interest of efficiency – both for this Court and
15 for the parties – to stay this action on the same terms as *McKenzie* and *Leghorn* were stayed, i.e.,
16 for 60 days from February 11, 2014, and subject to Plaintiff’s right to ask that this stay be lifted
17 once the terms of the *Fladell* settlement become public (and further subject to Wells Fargo being
18 given the right to respond.)

19
20 **NOW, THEREFORE, SUBJECT TO COURT ORDER, THE PARTIES HEREBY**
21 **STIPULATE THAT:**

22 1. All proceedings in this action are hereby stayed until 60 days from February 11,
23 2014, subject to Plaintiff’s right to ask the Court to lift the stay once the terms of
24 the proposed *Fladell* settlement are disclosed. In the event Plaintiff exercises this
25 right, Defendants will have the right to respond. Any pending discovery response
26 deadlines and any other pending deadlines are extended sixty days.

27 2. The parties shall appear on April 11, 2014 at 11:00 a.m. in Courtroom G, 450
28 Golden Gate Avenue, 15th Floor, San Francisco, California, for a Case

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Management Conference. The parties shall submit a Case Management Statement one week in advance of the Conference.

- 3. The Case Management Conference scheduled for Friday, February 28, 2014 at 9:30 a.m. is vacated.

IT IS SO STIPULATED.

DATED: February 25, 2014

SEVERSON & WERSON
A Professional Corporation

By: /s/ Philip Barilovits
Attorneys for Defendants
WELLS FARGO BANK N.A. and
WELLS FARGO INSURANCE SERVICES USA,
INC.

DATED: February 25, 2014

NICHOLS KASTER, PLLP

By: /s/ Kai H. Richter
Attorneys for Plaintiff
DOUGLAS CORBIN

ATTESTATION UNDER CIVIL L.R. 5-1(i)(3)

I, Philip Barilovits, am the ECF User whose ID and password are being used to file this joint stipulation. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Kai Richter has concurred in this filing.

/s/ Philip Barilovits

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IT IS SO ORDERED.

Dated: 2/26/14, 2014

