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15 Attorneys for Defendants
 16 JPMORGAN CHASE BANK, N.A. (erroneously sued herein as JP MORGAN CHASE BANK,
 17 N.A., as successor by merger to CHASE HOME FINANCE, L.L.C) and U.S. BANK, N.A.

18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**

20	NIKOS GLIMIDAKAS)	Case No.: C 13-02484-SC
21)	
22	Plaintiff,)	JOINT STIPULATION FOR STAY OF
23	VS.)	PROCEEDINGS; PROPOSED ORDER
24)	
25	JPMORGAN CHASE BANK, N.A., as)	
26	successor by merger to CHASE HOME)	ACTION FILED: May 1, 2013
27	FINANCE, L.L.C.; U.S. BANK, N.A.; and)	
28	DOES 1-100, inclusive,)	
)	
	Defendants.)	
)	
)	
)	

1 **JOINT STIPULATION**

2 Plaintiff NIKOS GLIMIDAKAS (“Plaintiff”), and Defendants JPMORGAN CHASE
3 BANK, N.A., (erroneously sued as JPMorgan Chase Bank, N.A., as successor by merger to
4 Chase Home Finance, L.L.C) and U.S. BANK, N.A. (collectively, “Defendants”), (collectively
5 “Parties”) by and through their counsel of record, hereby stipulate and request as follows:

6 1. Plaintiff filed his Complaint on May 1, 2013, in San Francisco County Superior
7 Court, Case No. CGC-13-531068;

8 2. The underlying issue of this action is the potential foreclosure of the subject
9 property located at 15 Duboce Avenue, San Francisco, California 94103;

10 3. On June 3, 2013, Defendants filed a Notice of Removal of Action with the United
11 States District Court, Northern District of California (San Francisco Division) and the above-
12 mentioned case was assigned Case No. 3:13-cv-02484-SC;

13 4. WHEREAS, Defendants timely filed a Motion to Dismiss Plaintiff’s Complaint
14 on June 10, 2013 in the above-entitled Court (“Motion to Dismiss”);

15 5. WHEREAS, Plaintiff’s response to Defendants’ Motion to Dismiss must currently
16 be filed on or before June 24, 2013;

17 6. WHEREAS, Defendants’ reply to Plaintiffs’ response to Defendants’ Motion to
18 Dismiss must currently be filed on or before July 1, 2013;

19 7. WHEREAS, the hearing on Defendants’ Motion to Dismiss is currently set for
20 July 26, 2013 at 10:00 a.m. in Courtroom 1, 17th Floor, before Hon. Samuel Conti;

21 8. WHEREAS, the Parties are currently engaged in settlement negotiations and
22 continue to engage in settlement negotiations in good faith.

23 9. WHEREAS, among other things, Defendant is determining Plaintiff’s suitability
24 for a loan modification.

25 10. WHEREAS, to allow the Parties (and the Court) to conserve resources and to
26 devote full attention to settlement, the Parties wish to stay all proceedings in this matter until
27 October 16, 2013, to continue exploring an amicable resolution to this matter;
28

1 11. WHEREAS, the Parties agree that no Trustee Sale will be conducted during the
2 stay;

3 12. WHEREAS, the Parties agree that this Stay can be lifted at anytime by either
4 party upon seven (7) days written notice;

5 13. WHEREAS, if Plaintiff's application for a modification of the loan at issue is
6 approved and Plaintiff accepts the terms of the modification, Plaintiff shall dismiss this action
7 with prejudice, and each party shall bear its own costs, including attorneys' fees.

8 14. This stipulation will not result in prejudice to any party and its impact on judicial
9 proceedings is not expected to be significant.

10 15. Nothing in this stipulation shall constitute a waiver of any arguments or defenses
11 that Plaintiff or Defendants may wish to assert in their pleadings, all of which are expressly
12 reserved.

13 IT IS SO STIPULATED AND REQUESTED THAT THE COURT STAY ALL
14 PROCEEDINGS IN THIS MATTER UNTIL OCTOBER 16, 2013.

15
16 Date: June 26, 2013

RUEHMANN LAW FIRM, P.C.

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18 By: /s/ Stephen C. Ruehmann
19 Stephen C. Ruehmann, Esq.
20 Attorney for Plaintiff
21 NIKOS GLIMIDAKAS

22 Date: June 19, 2013

KEESAL, YOUNG, & LOGAN

23
24 By: /s/ Helen Hsueh
25 Julie A. Kole, Esq.
26 Helen D. Hsueh, Esq.
27 Keesal, Young & Logan
28 Attorneys for Defendants JPMORGAN
CHASE BANK, N.A. (erroneously sued as
JP MORGAN CHASE BANK, N.A., as
successor by merger to CHASE HOME
FINANCE, L.L.C.) and U.S. BANK, N.A

PROPOSED ORDER

Having considered the Stipulation between Plaintiff NIKOS GLIMIDAKAS and Defendants JPMORGAN CHASE BANK, N.A. (erroneously sued as JP MORGAN CHASE BANK, N.A., as successor by merger to CHASE HOME FINANCE, L.L.C.) and U.S. BANK, N.A.:

IT IS HEREBY ORDERED:

1. The proceedings in this action shall be stayed until October 16, 2013.
2. The last day for Plaintiff to file and serve via overnight mail his response to Defendants' Motion to Dismiss is October 22, 2013.
3. The last day for Defendants to file and serve via overnight mail their reply to Plaintiffs' response to Defendants' Motion to Dismiss is October 29, 2013.
4. The hearing on Defendants' Motion to Dismiss is rescheduled to November 22, 2013.

Dated: 06/26/2013

