1       STEPHEN P. BERZON (SBN 46540) SCOTT A. KRONLAND (SBN 171693) JONATHAN WEISSGLASS (SBN 185008) ERIC P. BROWN (SBN 284245) Altshuler Berzon LP 177 Post Street, Suite 300 San Francisco, CA 94108         3       Hishuler Berzon LP 177 Post Street, Suite 300 San Francisco, CA 94108         5       Tei: (415) 421-7151 Fax: (415) 362-8064         6       E-mail: sberzon@alther.com jweissglass@alther.com ebrown@alther.com         7       jweissglass@alther.com ijweissglass@alther.com         8       ebrown@alther.com         9       Attorneys for Defendants City of Richmond and Morigage Resolution Partners LLC         10       BRUCE REED GOODMILLER (SBN 121491)       WILLIAM A. FALIK (SBN 5 100 Tunnel Rd CARLOS A. PRIVAT (SBN 197534)         12       CARLOS A. PRIVAT (SBN 197534)       Berkeley, CA 94705 Assistant City Attorney Tel: (510) 540-5960         13       CITY OF RICHMOND Fax: (510) 704-8803       E-mail: billfalik@gmail.com Richmond, CA 94804         15       Facesimil: (510) 620-6518       Morigage Resolution Partner: Carlos_privat@ci.richmond.ca.us carlos_privat@ci.richmond.ca.us carlos_privat@ci.richmond.ca.us         16       E-mail: bruce_goodmiller@ci.richmond.ca.us carlos_privat@ci.richmond.ca.us       Case No. CV-13-3663-CRB         18       VINTED STATES DISTRICT OOURT       SAN FRANCISCO DIVISION         24       Plaintiffs,       Case No. CV-13-3663-CRB         21       Plaintiffs,       Case No. CV-			
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11BRUCE REED GOODMILLER (SBN 121491) City AttorneyWILLIAM A. FALIK (SBN 5 100 Tunnel Rd12CARLOS A. PRIVAT (SBN 197534) Assistant City AttorneyBerkeley, CA 94705 Tel: (510) 540-596013CITY OF RICHMOND Fass: (510) 704-880314Richmond, CA 94804 Telephone: (510) 620-6509 Facsimile: (510) 620-6518 Carlos_privat@ci.richmond.ca.us carlos_privat@ci.richmond.ca.us carlos_privat@ci.richmond.ca.us16UNITED STATES DISTRICT COURT18NORTHERN DISTRICT OF CALIFORNIA20NORTHERN DISTRICT OF CALIFORNIA21SAN FRANCISCO DIVISION22WELLS FARGO BANK, NATIONAL ASSOCIATION, as Trustee, et al.,Case No. CV-13-3663-CRB STIPULATION TO CONSOI HEARINGS ON DEFENDANT TO DISMISS AND PLAINTI			
12CARLOS A. PRIVAT (SBN 197534) Assistant City Attorney CITY OF RICHMOND Richmond, CA 94804 Telephone: (510) 620-6509 Facsimile: (510) 620-6518 E-mail: billfalik@gmail.com14Richmond, CA 94804 Telephone: (510) 620-6518 Facsimile: (510) 620-6518 Carlos_privat@ci.richmond.ca.us carlos_privat@ci.richmond.ca.us Carlos_privat@ci.richmond.ca.us17Attorneys for Defendant City of Richmond18UNITED STATES DISTRICT COURT19UNITED STATES DISTRICT OF CALIFORNIA20NORTHERN DISTRICT OF CALIFORNIA21SAN FRANCISCO DIVISION22WELLS FARGO BANK, NATIONAL ASSOCIATION, as Trustee, et al.,Case No. CV-13-3663-CRB23Plaintiffs,STIPULATION TO CONSOI HEARINGS ON DEFENDAN TO DISMISS AND PLAINTI	53499)		
13CITY OF RICHMONDFax: (510) 704-880314450 Civic Center PlazaE-mail: billfalik@gmail.com14Richmond, CA 94804E-mail: billfalik@gmail.com15relephone: (510) 620-6509Attorney for Defendant16Facsimile: (510) 620-6518Mortgage Resolution Partners16E-mail: bruce_goodmiller@ci.richmond.ca.us carlos_privat@ci.richmond.ca.usMortgage Resolution Partners17Attorneys for Defendant City of RichmondAttorney for Counce18UNITED STATES DISTRICT COURT20NORTHERN DISTRICT OF CALIFORNIA21SAN FRANCISCO DIVISION22WELLS FARGO BANK, NATIONAL ASSOCIATION, as Trustee, et al.,Case No. CV-13-3663-CRB23Plaintiffs,STIPULATION TO CONSOI24Plaintiffs,HEARINGS ON DEFENDAN TO DISMISS AND PLAINTI			
<ul> <li>450 Civic Center Plaza E-mail: billfalik@gmail.com</li> <li>Richmond, CA 94804</li> <li>Telephone: (510) 620-6509 Attorney for Defendant</li> <li>Facsimile: (510) 620-6518 Mortgage Resolution Partners</li> <li>E-mail: bruce_goodmiller@ci.richmond.ca.us</li> <li>carlos_privat@ci.richmond.ca.us</li> <li>Attorneys for Defendant City of Richmond</li> <li>UNITED STATES DISTRICT COURT</li> <li>NORTHERN DISTRICT OF CALIFORNIA</li> <li>SAN FRANCISCO DIVISION</li> <li>WELLS FARGO BANK, NATIONAL</li> <li>ASSOCIATION, as Trustee, et al.,</li> <li>Plaintiffs,</li> <li>TipuLATION TO CONSOI</li> <li>HEARINGS ON DEFENDANTIONAL</li> <li>TO DISMISS AND PLAINTI</li> </ul>			
15Telephone: (510) 620-6509 Facsimile: (510) 620-6518 E-mail: bruce_goodmiller@ci.richmond.ca.us carlos_privat@ci.richmond.ca.usAttorney for Defendant Mortgage Resolution Partner.16E-mail: bruce_goodmiller@ci.richmond.ca.us carlos_privat@ci.richmond.ca.us1718Image: the transmitter of the transm			
15Facsimile: (510) 620-6518Mortgage Resolution Partners16E-mail: bruce_goodmiller@ci.richmond.ca.us carlos_privat@ci.richmond.ca.usAttorneys for Defendant City of Richmond1819UNITED STATES DISTRICT COURT20NORTHERN DISTRICT OF CALIFORNIA21SAN FRANCISCO DIVISION22WELLS FARGO BANK, NATIONAL ASSOCIATION, as Trustee, et al.,Case No. CV-13-3663-CRB23Plaintiffs,STIPULATION TO CONSOI HEARINGS ON DEFENDAN TO DISMISS AND PLAINTI			
16E-mail: bruce_goodmiller@ci.richmond.ca.us carlos_privat@ci.richmond.ca.us171818Attorneys for Defendant City of Richmond19UNITED STATES DISTRICT COURT20NORTHERN DISTRICT OF CALIFORNIA21SAN FRANCISCO DIVISION22WELLS FARGO BANK, NATIONAL ASSOCIATION, as Trustee, et al.,Case No. CV-13-3663-CRB23Plaintiffs,STIPULATION TO CONSOI HEARINGS ON DEFENDAN TO DISMISS AND PLAINTI	rs IIC		
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<ul> <li>WELLS FARGO BANK, NATIONAL ASSOCIATION, as Trustee, <i>et al.</i>,</li> <li>Plaintiffs,</li> <li>Case No. CV-13-3663-CRB</li> <li>STIPULATION TO CONSOL</li> <li>HEARINGS ON DEFENDANTION DISMISS AND PLAINTINE</li> </ul>			
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TO DISMISS AND PLAINTI			
25 v. MOTION FOR PRELIMINA	ARY		
26 CITY OF RICHMOND, CALIFORNIA, a RELIEF	LATED		
27 municipality, and MORTGAGE			
28 RESOLUTION PARTNERS LLC, 28 Defendants. Honorable Charles R. Breyer			

Doc. 3

1	WHEREAS, Plaintiffs have moved for a preliminary injunction;
2	WHEREAS, Defendants filed an opposition to the preliminary injunction motion on
3	August 22, 2013;
4	WHEREAS, Defendants filed a 7-page motion to dismiss this action for lack of subject
5	matter jurisdiction on August 23, 2013;
6	WHEREAS, the contentions in Defendants' motion to dismiss are also set forth as part of
7	their opposition to the preliminary injunction motion;
8	WHEREAS, the parties agree that it makes sense for the Court to consider the motion to
9	dismiss contemporaneously with the motion for preliminary injunction;
10	WHEREAS, the preliminary injunction hearing is set for September 13, 2013, and the
11	motion to dismiss hearing is set for October 11, 2013;
12	WHEREAS, the parties have previously agreed that the hearing date on the preliminary
13	injunction can be moved to September 9, 10, 11, or 12, 2013, to accommodate the vacation
14	schedule of Defendants' lead counsel (Doc. 25);
15	IT IS HEREBY STIPULATED by all parties as follows:
16	1. Plaintiffs will file their opposition to the motion to dismiss by August 30, 2013;
17	2. Defendants will file any reply on the motion to dismiss by September 4, 2013; and
18	3. The hearing on the preliminary injunction and the motion to dismiss can be moved to
19	September 9, 10, 11, or 12, 2013.
20	Dated: August 23, 2013ALTSHULER BERZON LLP
21	By: /s/ Scott A. Kronland
22	Scott A. Kronland
23	ATTORNEYS FOR DEFENDANTS CITY OF RICHMOND, CALIFORNIA
24	MORTGAGE RESOLUTION PARTNERS LLC
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	Stipulation to Consolidate Hearings, Case No. CV-13-3663-CRB

1	ROPES & GRAY LLP
2	By: /s/ Rocky C. Tsai
3	Rocky C. Tsai
4	ATTORNEYS FOR PLAINTIFFS WELLS FARGO BANK, N.A., AS TRUSTEE;
5	DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE; AND DEUTSCHE
6	BANK TRUST COMPANY AMERICAS, AS TRUSTEE
7	
8	
9	I attest that concurrence in the filing of this document has been obtained from Rocky C.
10	Tsai, whose conformed signature is set forth above.
11	/s/ Scott A. Kronland
12	Scott A. Kronland
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	2 Stipulation to Consolidate Hearings, Case No. CV-13-3663-CRB
	Supulation to Consolidate Heatings, Case NO. CV-15-3003-CKD
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