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27 Attorneys for Defendant
 28 ASSURANT, INC. and AMERICAN SECURITY INSURANCE COMPANY

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

20 PATRICK URSOMANO, GIOVANNI
 21 CANONICO and URSULA CANONICO,
 22 individually and on behalf of all others
 23 similarly situated,

24 Plaintiffs,

25 v.

26 WELLS FARGO BANK, N.A.; WELLS
 27 FARGO INSURANCE, INC.; ASSURANT,
 28 INC.; and AMERICAN SECURITY
 INSURANCE COMPANY,

Defendants.

Case No. 3:13-cv-04381-EMC

**STIPULATION AND ~~PROPOSED~~ ORDER
 ESTABLISHING BRIEFING SCHEDULE
 ON DEFENDANTS' MOTION TO STAY;
 DECLARATION OF PETER S. HECKER
 IN SUPPORT OF SAME**

SMRH:417443012.1

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Dated: February 11, 2014

/s/ Peter S. Hecker
Peter S. Hecker
SHEPPARD MULLIN RICHTER & HAMPTON LLP
Attorneys for Assurant, Inc. and American Security
Insurance Company

Dated: February 11, 2014

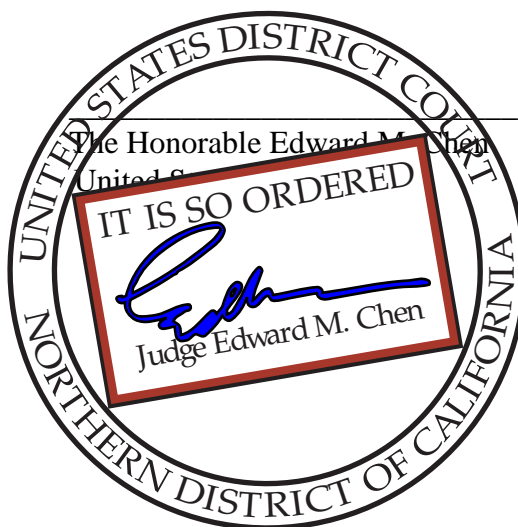
/s/ Peter A. Muhic
Peter A. Muhic
KESSLER TOPAZ MELTZER & CHECK LLP
Attorneys for Plaintiffs Patrick Ursomano, Giovanni
Canonico and Ursula Canonico

Dated: February 11, 2014

/s/ Philip Barilovits
Philip Barilovits
SEVERSON & WERSON
Attorneys for Wells Fargo Bank, N.A. and Wells
Fargo Insurance, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February ¹²____, 2014



1 **DECLARATION OF PETER S. HECKER**

2 I, Peter S. Hecker, declare:

3 1. I am an attorney duly admitted to practice before this Court. I am a partner with
4 the law firm of Sheppard Mullin Richter & Hampton, LLP, counsel for defendants Assurant, Inc.
5 and American Security Insurance Company in this case (collectively "ASIC"). I have personal
6 knowledge of the facts set forth below.

7 2. As set forth in the above stipulation, plaintiffs Patrick Ursomano, Giovanni
8 Canonico and Ursula Canonico (collectively "plaintiffs") have stipulated that plaintiffs shall file
9 and serve their opposition to defendants' motion to stay (the "motion") on or before February 12,
10 2014; defendants shall file and serve their reply papers on or before February 14, 2014; and
11 consideration of the motion shall be at the earliest convenience of the Court.

12 3. Previous time modifications in this case include:

- 13 • On December 4, 2013, the Court continued a Case Management Conference and
14 the hearing on the ASIC's motion to dismiss. (ECF No. 26)
- 15 • On December 5, 2013, the parties stipulated to extend Plaintiffs' time to respond
16 to ASIC's motion to dismiss and ASIC's time to reply. (ECF No. 28)
- 17 • On December 12, 2013, the parties stipulated to extend Wells Fargo's time to
18 respond to the First Amended Class Action Complaint. (ECF No. 29)
- 19 • On January 23, 2014, the Court continued a Case Management Conference and
20 the hearing on Defendants' motions to dismiss. (ECF No. 40)

21 4. Due to the minimal nature of the stipulated shortening of time, I believe that the
22 requested extensions for consideration of the stay motion will not have any significant impact on
23 the schedule for the case.

24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct.

26 Executed this 11th day of February 2014 at San Francisco, California.
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/s/ Peter S. Hecker

PETER S. HECKER