

1 LOCKE LORD LLP
 Regina J. McClendon (SBN 184669)
 2 rmcclendon@lockelord.com
 Sally W. Mimms (SBN 276093)
 3 smimms@lockelord.com
 4 44 Montgomery Street, Suite 4100
 San Francisco, CA 94104
 Telephone: 415-318-8810
 5 Facsimile: 415-676-5816

6 Attorneys for Defendants
 WELLS FARGO BANK, N.A., SUCCESSOR BY MERGER WITH WELLS FARGO BANK
 7 SOUTHWEST N.A., FORMERLY KNOWN AS WACHOVIA MORTGAGE FSB, FORMERLY
 KNOWN AS WORLD SAVINGS BANK FSB (sued herein as WELLS FARGO BANK, N.A. and
 8 WELLS FARGO HOME MORTGAGE, a division of WELLS FARGO BANK, N.A.); CORY
 MOELLER; ANGELA NAIL; LANA KRAHN; and KAREN LEE

9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

13 YOLANDA BUMATAY MULATO,)	CASE NO. 3:14-cv-00884-NC
)	
14 Plaintiff,)	Hon. Nathanael Cousins
)	
15 vs.)	STIPULATED REQUEST TO CONTINUE
)	CASE MANAGEMENT CONFERENCE;
16 WELLS FARGO BANK, N.A., WELLS)	[PROPOSED] ORDER
FARGO HOME MORTGAGE, a division of)	
17 WELLS FARGO BANK, N.A., CORY)	[Local Rules 7-12 and 16-2(e)]
MOELLER, ANGELA NAIL, LANA)	
18 KRAHN, AND KAREN LEE, employees)	Case Management Conference currently set for:
and agents of WELLS FARGO HOME)	July 30, 2014 at 10:00 a.m.
19 MORTGAGE (“WELLS FARGO”),)	
)	
20 Defendants.)	

21
 22 The parties to this action, Plaintiff Yolanda Bumatay Mulato (“Plaintiff”) and defendants
 23 Wells Fargo Bank, N.A. (“Wells Fargo”) and Cory Moeller, Angela Nail, Lana Krahn, and Karen
 24 Lee’s (collectively, “Employee Defendants”), hereby jointly stipulate and request, pursuant to Local
 25 Rules 7-12 and 16-2(e), that this Court continue the Case Management Conference currently set for
 26 July 30, 2014 at 10:00 a.m. to August 6, 2014 at 1:00 p.m. (the date and time Wells Fargo’s and the
 27 Employee Defendants’ motions to dismiss are set to be heard) or such other date and time thereafter
 28 that is convenient to the Court, and in support state as follows:

1 1. On May 19, 2014, the Court entered an order continuing the initial Case Management
2 Conference in this matter to July 30, 2014 at 10:00 a.m. Dkt. 36. The order further stated that a
3 joint case management statement must be filed seven (7) days before that date, July 23, 2014.

4 2. Thereafter, on June 6, 2014, the Court entered an order continuing the hearings on
5 Wells Fargo's motion to dismiss the first amended complaint for failure to state a claim (Dkt. 40)
6 and the Employee Defendant's motion to dismiss for lack of personal jurisdiction¹ (Dkt. 42) to
7 August 6, 2014 at 1:00 p.m. Dkt. 45.

8 3. The parties hereby request that the Case Management Conference currently set for
9 July 30, 2014 be continued to August 6, 2014 at 1:00 p.m., to be heard with the motions to dismiss,
10 or such other date and time thereafter that is convenient to the Court.

11 4. The parties stipulate to and request this continuance because, until this Court rules on
12 Wells Fargo's and the Employee Defendants' motions to dismiss, it is unclear what claims against
13 what parties will be at issue in this case. As such, the parties believe that it will better conserve the
14 resources of the parties and the Court if the Case Management Conference is held at the same date
15 and time as the hearings on the motions to dismiss, or at some date and time after the motions are
16 heard.

17 WHEREFORE, pursuant to Local Rules 7-12 and 16-2(e), the parties jointly request and
18 stipulate that the Case Management Conference currently set for July 30, 2014 be continued to
19 August 6, 2014 at 1:00 p.m. or to some date and time thereafter that is convenient to the Court, with
20 a joint case management statement to be filed seven (7) days before the continued date.

21
22 Dated: July 17, 2014

Respectfully submitted,

23 LOCKE LORD LLP

24 By: /s/ Regina J. McClendon

25 Regina J. McClendon

26 Attorneys for Defendants

27 WELLS FARGO BANK, N.A., SUCCESSOR BY

28 ¹ By submitting this stipulated request, the Employee Defendants do not intend to waive their arguments that the Court lacks personal jurisdiction over them.

