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9 *Attorneys for Plaintiff Margo Perryman*

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**IN THE UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

MARGO PERRYMAN individually, and for
 other persons similarly situated,

Plaintiff,

vs.

LITTON LOAN SERVICING, LP; OCWEN
 LOAN SERVICING LLC; AMERICAN
 SECURITY INSURANCE COMPANY;
 AMERICAN MODERN HOME
 INSURANCE COMPANY; ALTISOURCE
 PORTFOLIO SOLUTIONS, S.A., BELTLINE
 ROAD INSURANCE AGENCY, INC.; and
 DOES 4-100,

Defendants.

Case No.: 3:14-cv-02261-JST

**STIPULATION TO EXTEND DEADLINE
 FOR PLAINTIFF TO FILE AN
 AMENDED COMPLAINT; ~~PROPOSED~~
 ORDER**

Civil Local Rule 6-2

1 Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, Plaintiff Margo Perryman (“Plaintiff”), and
2 Defendants Litton Loan Servicing, LP and American Modern Home Insurance Company
3 (“American Modern”), through their respective attorneys, stipulate as follows:

4 WHEREAS, on August 19, 2015, this Court held a Case Management Conference and set
5 a deadline of November 19, 2015 for Plaintiff to file a Second Amended Complaint (Dkt. No.
6 212);

7 WHEREAS, prior to amending her Complaint, Plaintiff contends she requires certain
8 documents and/or testimony from non-party Southwest Business Corporation (“SWBC”);

9 WHEREAS, on October 9, Plaintiff served a subpoena to obtain documents and testimony
10 from SWBC;

11 WHEREAS, as of the date of this stipulation, Plaintiff contends that SWBC has not
12 produced all documents and information responsive to the subpoena;

13 WHEREAS, Defendant American Modern has also entered into a settlement in principle in
14 a parallel, partially overlapping class action pending in the Southern District of New York,
15 captioned *Lyons v. Litton Loan Servicing LP, et al.*, S.D.N.Y. Case No. 13-cv-00513 (ALC)
16 (“*Lyons*”), whose terms will be finalized by December 12, 2015 and will become public shortly
17 thereafter;

18 WHEREAS, this case is currently stayed against all Defendants other than Litton and
19 American Modern – American Security Insurance Company, Ocwen Loan Servicing, LLC,
20 Altisource Portfolio Solutions, S.A., and Beltline Road Insurance Agency, Inc., pending the
21 resolution of settlement proceedings in *Lee v. Ocwen Loan Servicing, LLC, et al.*, S.D. Fla. Case
22 No. 14-cv-60649;

23 WHEREAS, Plaintiff and Defendants Litton and American Modern stipulate and agree
24 that good cause exists to extend the deadline for Plaintiff to file the Second Amended Complaint
25 to January 15, 2016, to allow Plaintiff to complete discovery as to SWBC, and assess the impact
26 of American Modern’s settlement in the *Lyons* action on this case and Plaintiff’s potential
27 amendments to the operative Complaint.

28 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT, subject to

1 the Court's approval, Plaintiff and Defendants Litton and American Modern agree to the
2 following:

- 3 • The deadline for Plaintiff to file and serve the Second Amended Complaint shall be
4 extended to January 15, 2016.

5 DATED: November 16, 2015

LAW OFFICE OF SHERI L. KELLY

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By: /s/ Sheri L. Kelly

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Attorneys for Plaintiff

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MARGO PERRYMAN

9 DATED: November 16, 2015

HUNTON & WILLIAMS LLP

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By: /s/ Ryan Becker

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Attorneys for Defendants

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OCWEN LOAN SERVICING LLC and

LITTON LOAN SERVICING, LP

14 DATED: November 16, 2015

BAKER HOSTETLER

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By: /s/ Rodger Eckelberry

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Attorneys for Defendant

AMERICAN MODERN HOME

INSURANCE COMPANY

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FILER'S ATTESTATION

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I, Sheri L. Kelly, attest, pursuant to Civil L.R. 5-1(i)(3), that concurrence in the filing of
21 this document has been obtained from the other signatory to this document.

22

DATED: November 16, 2015

LAW OFFICE OF SHERI L. KELLY

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Sheri L. Kelly

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By: /s/ Sheri L. Kelly

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Sheri L. Kelly

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Attorneys for Plaintiff

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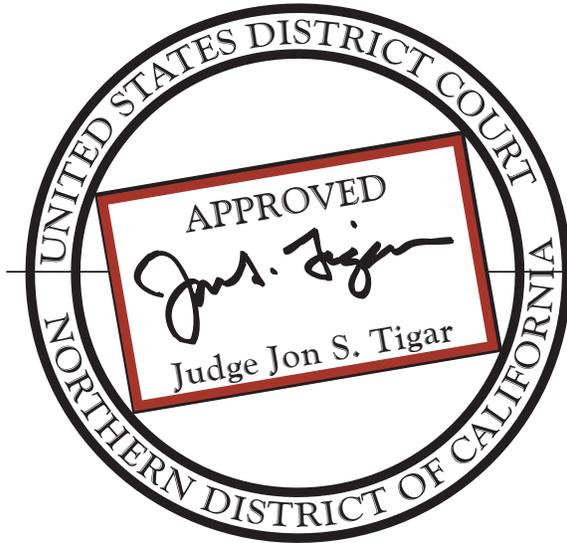
MARGO PERRYMAN

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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

2 The deadline for Plaintiff to file and serve the Second Amended Complaint shall be extended to
3 January 15, 2016.

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6 DATED: November 18, 2015



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