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 Ocwen Financial Corporation
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9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**

11 GEORGE CAMBERIS and CLAUDIA
 12 CAMBERIS, individually, and on behalf
 of the class of all others similarly situated,

13 Plaintiff,

14 vs.

15 OCWEN FINANCIAL CORPORATION,
 16 Defendant.
 17

Case No. 3:14-CV-02970-EMC

**STIPULATION AND [PROPOSED] ORDER
 TO STAY ACTION PENDING MEDIATION**

Judge: Hon. Edward M. Chen

Action Filed: June 26, 2014

1 WHEREAS, defendant Ocwen Financial Corporation filed a Motion to Dismiss Plaintiffs'
2 Complaint Pursuant to Fed. R. Civ. P. 12(b)(6) (the "Motion") on August 27, 2014 [Dkt 19], and the
3 Motion is now fully briefed and set for a hearing before the Court on October 21, 2014, at 2:00 p.m.;

4 WHEREAS the initial Case Management Conference also is set for October 21, 2014, at 2:00
5 p.m [Dkt 27];

6 WHEREAS, the parties voluntarily agreed to submit their dispute to Private ADR and filed a
7 Stipulation and [Proposed] Order Selecting ADR Process on October 7, 2014 [Dkt 34];

8 WHEREAS, the parties have selected a private mediator and are in the process of clearing dates
9 for a mediation to take place within the next 30-60 days;

10 WHEREAS, the parties desire to stay this action for 65 days to afford them an opportunity to
11 resolve this lawsuit before a hearing or decision on the Motion;

12 WHEREAS, the parties agree that a successful mediation of this action would require that no
13 further activity occur in the case pending the mediation;

14 The parties therefore respectfully request that the Court stay this action and reset the hearing on
15 the Motion and the Case Management Conference for some date on or after December 15, 2014. In
16 furtherance of this request, the parties state:

17 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that:

- 18 1. All proceedings before this Court in this action are stayed for sixty-five (65) days;
- 19 2. If mediation concludes with no resolution of this action, then the hearing on the Motion and
20 the Case Management Conference shall take place on or after December 15, 2014, at a time
21 and date selected by the Court.

1 DATED: October 10, 2014

Respectfully Submitted,
GREENBERG TRAURIG, LLP

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4 By: /s/ Jennifer L. Gray
5 Jeff E. Scott
6 Jennifer L. Gray
7 Attorneys for Defendant
8 Ocwen Financial Corporation

MORRIS POLICH & PURDY LLP

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10 By: /s/ David J. Vendler
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*Attorneys for Plaintiffs, GEORGE and CLAUDIA
CAMBERIS, and all others similarly situated*

1
2 **ATTESTATION CLAUSE**

3 I, Jennifer L. Gray, and the ECF user whose ID and password are being used to file this
4 Stipulation to Stay Action Pending Mediation, in compliance with Civil Local Rule 5-1, hereby attest
5 that Attorneys for Plaintiffs, David J. Vendler of Morris Polich & Purdy LLP and Michael R. Brown of
6 Michael R. Brown, APC concurred with this filing.
7

8 DATED: October 10, 2014

GREENBERG TRAURIG, LLP

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10 By: /s/ Jennifer L. Gray
Jennifer L. Gray

1 [PROPOSED] ORDER

2 PURSUANT TO STIPULATION, all proceedings in this matter are stayed for a period of sixty-
3 five (65) days. If mediation concludes with no resolution of this action, the hearing on the Motion to
4 Dismiss and the Case Management Conference shall take place on ~~or after December 15, 2014~~, at a time
5 and date selected by the Court. A joint CMC Statement shall be filed by December 11,
6 2014.

7 IT IS SO ORDERED.

8 October 14, 2014

