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6 Attorneys for Defendants
OCWEN LOAN SERVICING, LLC
7

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

10
11 MARIA VILLACIS,

12 Plaintiff,

13 vs.

14 OCWEN LOAN SERVICING, LLC; and
15 SAGE POINT LENDER SERVICES, LLC;
and DOES 1-20, et al.,

16 Defendants.
17

Case No. 3:14-cv-03279-JCS

Magistrate Judge Joseph C. Spero

**FIRST AMENDED STIPULATION
TO EXTEND TIME TO RESPOND
TO THE COMPLAINT (L.R. 6-1)**

Complaint Served: July 8, 2014
Current Response Date: Aug. 14, 2014
New Response Date: Sep. 3, 2014

1 IT IS HEREBY STIPULATED by and between Plaintiff Maria Villacis
2 (“Plaintiff”), and Defendant Ocwen Loan Servicing, LLC (“Ocwen”) and Sage Point
3 Lender Services, LLC (“Sage,” sometimes jointly referred to with Ocwen as
4 “Defendants”), through their respective counsel of record, the following:

5 WHEREAS, Plaintiff filed the underlying Complaint in this action on July 8,
6 2014, in the Superior Court of California, County of Alameda.

7 WHEREAS, Sage filed a Declaration of Non-Monetary Status on July 21, 2014.

8 WHEREAS, Defendants removed the action to this honorable Court on July 21,
9 2014.

10 WHEREAS, Ocwen’s current deadline to file a response to the Complaint
11 based on a previous Stipulation is August 14, 2014.

12 WHEREAS, respective counsel for Plaintiff and Ocwen are making efforts to
13 potentially resolve the dispute at issue.

14 WHEREAS, the current foreclosure sale date set for the subject property, as
15 continued by Sage, is October 2, 2014.

16 IT IS NOW THEREFORE AGREED by and between the parties hereto and
17 through their respective counsel that:

18 Ocwen’s deadline to file a response to the Complaint is now September 3,
19 2014;

20 Unless altered by further stipulation or agreement between counsel, Plaintiff
21 will have until September 15, 2014 to file a potential noticed motion for a preliminary
22 injunction preventing Defendants from effecting a foreclosure sale of the subject
23 property, and the hearing on said motion will be set for the earliest available date for
24 the Court;

25 Defendants will not effect a foreclosure sale of the subject property prior to the
26 new foreclosure sale date of October 2, 2014. Further, if Plaintiff files a noticed
27 motion for a preliminary injunction by September 15, 2014, and the earliest available
28

1 hearing date for the motion is after October 2, 2014, Defendants will postpone the sale
2 date to take place at least 2 days after the hearing on Plaintiff's motion;

3 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.
4

5 Respectfully submitted,
6

7 DATED: August 13, 2014 BLANK ROME LLP

8
9 By: /s/ Robert P. Merten III
10 Todd A. Boock
11 Robert P. Merten III
12 Attorneys for Defendant
13 OCWEN LOAN SERVICING, LLC

14 DATED: August 13, 2014 AMSL LEGAL GROUP, LLP

15 By: /s/ Chris C. Chapman
16 Starlet J. Japp
17 Chris C. Chapman
18 Attorneys for Defendant
19 SAGE POINT LENDER SERVICES, LLC

20 DATED: August 13, 2014 LAW OFFICE OF JASON W. ESTAVILLO, PC

21 By: /s/ Jason W. Estavillo
22 Jason W. Estavillo
23 Attorneys for Plaintiff
24 MARIA VILLACIS

25 Dated: August 15, 2014



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ATTESTATION

I hereby certify that for all conformed signatures indicated by a /s/ I have obtained concurrence in the filing of the document which shall serve in lieu of signature(s) on the document.

DATED: August 13, 2014 BLANK ROME LLP

By: /s/ Robert P. Merten III

Todd A. Boock
Robert P. Merten III
Attorneys for Defendant
OCWEN LOAN SERVICING, LLC

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3
4 I am employed in the County of Los Angeles, State of California. I am over
5 the age of 18 and not a party to the within action; my business address is 2029
6 Century Park East, 6th Floor, Los Angeles, California 90067.

7 On August 14, 2014, I served the foregoing document entitled **FIRST**
8 **AMENDED STIPULATION TO EXTEND TIME TO RESPOND TO THE**
9 **COMPLAINT (L.R. 6-1)** on the interested parties in this action addressed and sent
10 as follows:

11 **Starlet Joy Japp**
12 AMSL Legal Group, LLP
13 400 Exchange, Suite 100
14 Irvine, CA 92602
15 949-265-9940
16 Fax: 949-236-5567

17 **By Envelope:** By placing the original a true copy thereof enclosed in a
18 sealed envelope addressed as above and delivering said envelope:

19 **By Mail:** As follows: I am “readily familiar” with this firm’s
20 practice of collection and processing correspondence for mailing.
21 Under that practice it would be deposited with the U.S. postal service
22 on that same day with postage thereon fully prepaid at Los Angeles,
23 California in the ordinary course of business. I am aware that on
24 motion of the party served, service is presumed invalid if postal
25 cancellation date or postage meter date is more than one day after date
26 of deposit for mailing in affidavit.

27 **By Electronic Filing:** I am familiar with the United States District Court,
28 Northern District of California’s practice for collecting and processing electronic
filings. Under that practice, documents are electronically filed with the court. The
court’s CM/ECF system will generate a Notice of Electronic Filing (NEF) to the
filing party, the assigned judge, and any registered users in the case. The NEF will
constitute service of the document. Registration as a CM/ECF user constitutes
consent to electronic service through the court’s transmission facilities. Under said
practice, the following CM/ECF users were served:


29 **Jason W. Estavillo**
30 Law Office of Jason W. Estavillo
31 1330 Broadway, Suite 1030
32 Oakland, CA 94612
33 Tel: 510-982-3001
34 Fax: 510-982-3002
35 Email: jestavillo@estavillolaw.com

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Christian Crutchfield Chapman
AMSL Legal Group, LLP
400 Exchange, Suite 100
Irvine, CA 92602
Tel: 949-265-9940 Ext 181
Fax: 949-236-5567
Email: cchapman@amslca.com

Executed on August 14, 2014, at Los Angeles, California.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.



DIA S. ALESSI