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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

11 CHRISTINA VERHOEK, an individual,

12 Plaintiff,

13 vs.

14 U.S. BANK NATIONAL ASSOCIATION, a business entity of
 15 unknown form; U.S. BANK HOME MORTGAGE, a business entity of
 16 unknown form; and DOES 1-50,

17 Defendants.

Case No. 14-cv-04821-EMC

[Assigned to the Honorable Edward M. Chen]

REQUEST AND STIPULATION TO EXTEND TIME TO FILE FIRST AMENDED COMPLAINT

[filed: September 30, 2014]

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19 TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
 20 DISTRICT OF CALIFORNIA, ALL PARTIES AND THEIR ATTORNEYS OF
 21 RECORD:

22 Defendant US Bank N.A. (also erroneously sued as U.S. Bank Home
 23 Mortgage) (“US Bank”) filed a motion to dismiss Plaintiff Christina Verhoek
 24 (“Verhoek”)’s Complaint. At the hearing on the motion to dismiss held on January
 25 29, 2015, the Court and the parties discussed the timeline pled in the Complaint
 26 regarding the loan modification submission, trial period plan offer and denial of a
 27 permanent modification. The Court granted Verhoek leave to amend the complaint
 28 to address some of the issues raised at the hearing. US Bank has subsequently sent

1 Verhoek documents showing what it claims is the true timeline of submissions and
2 indicated its belief that the Complaint contained material misrepresentations in
3 violation of FEDERAL RULE OF CIVIL PROCEDURE, RULE 11(b). Verhoek’s counsel
4 needs additional time to review the documents before filing a First Amended
5 Complaint. US Bank and Verhoek have stipulated to extend Verhoek’s time to file
6 a First Amended Complaint.

7 The parties therefore stipulate and agree that, with the Court’s permission and
8 order, Verhoek’s time to file a First Amended Complaint is continued to March 6,
9 2015. US Bank shall have 21 days from the filing of the First Amended Complaint
10 to respond to it, including through a motion to dismiss. US Bank has not waived
11 any objection to the venue or to the jurisdiction of the court over the person of the
12 defendant, or any other challenge to the complaint or other pleadings in this case.

13 DATED: February 25, 2015

14 By /s/ Frederick A. Haist
15 E. SCOTT PALMER
16 FREDERICK A. HAIST
PALMER, LOMBARDI & DONOHUE LLP
Attorneys for US Bank N.A.

17 DATED: February 25, 2015

18 By /s/ Nathan L. Scheg
19 NATHAN L. SCHEG
20 IRONHORSE LAW GROUP, PC
Attorneys for Christina Verhoek

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22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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25 DATED: 3/5, 2015

26 United Sta

