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10 Attorneys for Defendant US Bank N.A. (also erroneously sued as U.S. Bank Home
 11 Mortgage)

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

14 CHRISTINA VERHOEK, an
 15 individual,
 16
 17 Plaintiff,
 18
 19 vs.
 20 U.S. BANK NATIONAL
 21 ASSOCIATION, a business entity of
 22 unknown form; U.S. BANK HOME
 23 MORTGAGE, a business entity of
 24 unknown form; and DOES 1-50,
 25
 26 Defendants.

27 Case No. 14-cv-04821-EMC
 28 [Assigned to the Honorable Edward M. Chen]
**REQUEST AND STIPULATION TO
 CONTINUE DATE FOR
 DEFENDANT US BANK N.A.'S
 RESPONSE TO PLAINTIFFS'
 COMPLAINT AND TO CONTINUE
 THE CASE MANAGEMENT
 CONFERENCE**

[filed: September 30, 2014]

PALMER, LOMBARDI & DONOHUE LLP
 515 South Flower Street, Suite 2100
 Los Angeles, California 90071

1 TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
2 DISTRICT OF CALIFORNIA, ALL PARTIES AND THEIR ATTORNEYS OF
3 RECORD:

4 Defendant US Bank N.A. (also erroneously sued as U.S. Bank Home
5 Mortgage) (“US Bank”), and Plaintiff Christina Verhoek (“Verhoek”) have
6 discussed settlement of this case and believe that they have a tentative settlement,
7 but additional actions need to be completed before the terms can be finalized. For
8 instance, US Bank has discovered that there is a lien placed on the property by the
9 Homeowners’ Association for unpaid fees. This lien will need to be released before
10 the settlement can be finalized. The settlement will also need to be reduced to
11 writing and the Parties will need to review the settlement documents. [Haist Decl.
12 ¶3.]

13 Verhoek filed a First Amended Complaint on March 5, 2015. US Bank’s
14 response to the First Amended Complaint is due on March 26, 2015. US Bank
15 intends to move to dismiss the First Amended Complaint. The Parties believe that
16 continuing the time for US Bank to file a motion to dismiss and continuing the case
17 management conference will allow them to finalize the settlement before any further
18 motion work or use of the Court’s time due to the likely settlement of the case
19 within the next 30 days.

20 With the Court’s permission and order, US Bank and Verhoek hereby
21 stipulate to extend US Bank’s time to file a response to the First Amended
22 Complaint 30 days to April 27, 2015. US Bank has not waived any objection to the
23 venue or to the jurisdiction of the court over the person of the defendant, or any
24 other challenge to the complaint or other pleadings in this case.

25 The Court has also set a case management conference for April 2, 2015. The
26 Parties request that the Court also continue that hearing for at least 30 days to allow
27 any further pleading motions to be filed before the case management conference
28 takes place. The Parties request and stipulate that the Court can set the case

1 management conference on May 7, 2015 at 10:30 a.m., or as the Court otherwise
2 orders.

3
4 DATED: March 20, 2015

5 By /s/ Frederick A. Haist
6 E. SCOTT PALMER
7 FREDERICK A. HAIST
8 PALMER, LOMBARDI & DONOHUE LLP
9 Attorneys for US Bank N.A.

10 DATED: March 20, 2015

11 By /s/ Nathan L. Scheg
12 NATHAN L. SCHEG
13 IRONHORSE LAW GROUP, PC
14 Attorneys for Christina Verhoek

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

16 DATED: 3/25 , 2015

