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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 BRIEFING DATES ON
 DEFENDANT US BANK N.A.'S
 MOTION TO DISMISS TO
 PLAINTIFF'S FIRST AMENDED
 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 proposed 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 lien was over \$26,000, which will require
11 further calculations for the proposed settlement and has required further time to
12 determine all of the terms of the proposed settlement. The settlement will also need
13 to be reduced to writing and the Parties will need to review the settlement
14 documents. [Haist Decl. ¶3.]

15 Verhoek filed a First Amended Complaint on March 5, 2015. After obtaining
16 an extension, US Bank filed a motion to dismiss the First Amended Complaint on
17 April 27, 2015. The motion to dismiss hearing is set for July 2, 2015. The Parties
18 believe that extending the time for filing briefs on the motion to be closer to the
19 hearing date and continuing the case management conference will allow them to
20 finalize the settlement before any further motion work or use of the Court’s time due
21 to the likely settlement of the case.

22 With the Court’s permission and order, US Bank and Verhoek hereby
23 stipulate to extend the time for the parties to file further briefing on the April 27,
24 2015 filed motion to dismiss. The parties propose and agree that Verhoek’s
25 opposition shall be due 21 days before the July 2, 2015 hearing date (i.e., June 11,
26 2015), and US Bank’s reply shall be due 14 days before the July 2, 2015 hearing
27 (i.e., June 18, 2015).

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1 The Court has also set a case management conference for May 7, 2015. The
2 Parties request that the Court also continue that hearing to approximately 30 days
3 after the July 2, 2015 hearing, such as July 30, 2015 at 10:30 a.m. or as the Court
4 otherwise orders.

5
6 DATED: April 28, 2015

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

10 DATED: April 28, 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. CMC reset for 8/6/15
16 at 9:30 a.m. A joint cmc
17 statement shall be filed
by 7/30/15.

18 DATED: May 4, 2015

19 United States District Court Judge

