

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

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 WELLS FARGO BANK, N.A.  
 ("Wells Fargo")  
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8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
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11 YADIRA DIAZ, an individual; ALEX  
 DELGADO BASTIDAS, an individual;

12 Plaintiffs,  
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14 v.  
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16 WELLS FARGO BANK, N.A., CAL-  
 WESTERN RECONVEYANCE, LLC;  
 17 TRIDENT FINANCIAL GROUP, INC. and  
 DOES 1 through 20, inclusive,

18 Defendants.  
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CASE NO.: 3:15-CV-01150-JCS

**JOINT STIPULATION TO EXTEND TIME  
 TO RESPOND TO COMPLAINT**

20  
 21 **TO THE HONORABLE COURT:**

22 Plaintiffs, YADIRA DIAZ and ALEX DELGADO BASTIDAS ("Plaintiffs"), and  
 23 defendant, WELLS FARGO BANK, N.A., successor by merger with Wells Fargo Bank  
 24 Southwest, N.A., formerly known as Wachovia Mortgage, FSB, formerly known as World  
 25 Savings Bank, FSB ("Wells Fargo"), through their counsel of record, submit the following  
 26 stipulation to extend time to respond to the Complaint pursuant to N.D. Cal. Local Rule 6-1(a). A  
 27 Court Order is not required at this time since this stipulation will not alter the date of any event  
 28 or any deadline already fixed by Court Order.

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**RECITALS**

1. WHEREAS, on February 6, 2015, Plaintiffs commenced an action entitled as captioned above, in the Superior Court of the State of California, County of San Mateo, Case No. CIV532437;

2. WHEREAS, Wells Fargo was served with the Complaint on February 9, 2015;

3. WHEREAS, Defendant Wells Fargo removed the action to this Court;

4. WHEREAS, the parties agree that Wells Fargo’s deadline to respond to the Complaint is extended until April 1, 2015; and

5. WHEREAS, this stipulation waives no rights of any parties.

**STIPULATION**

**IT IS HEREBY STIPULATED**, that the deadline for Wells Fargo to respond to the Complaint is extended 14 days from March 18, 2015 to April 1, 2015.

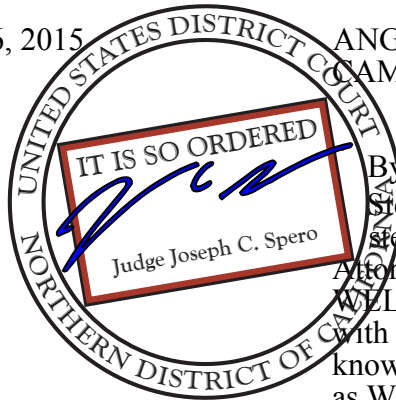
**ATTESTATION PURSUANT TO GENERAL ORDER 45**

I, Steven R. Telles, attest that concurrence in the filing of this document has been obtained from each signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this day of March 16, 2015.

Dated: March 16, 2015

ANGLIN, FLEWELLING, RASMUSSEN,  
CAMPBELL & TRYTTEN LLP

Dated: 3/17/15



By:         /s/ Steven R. Telles        

Steven R. Telles  
stelles@afrc.com

Attorneys for Defendant  
WELLS FARGO BANK, N.A., successor by merger  
with Wells Fargo Bank Southwest, N.A., formerly  
known as Wachovia Mortgage, FSB, formerly known  
as World Savings Bank, FSB (“Wells Fargo”)

Dated: March 16, 2015

NICK PACHECO LAW GROUP, APC

By:         /s/ Nick Pacheco        

Nick Pacheco, Esq.  
nickpacheco@nickpachecolaw.com

Attorneys for Plaintiffs  
YADIRA DIAZ and ALEX DELGAGO BASTIDAS

**CERTIFICATE OF SERVICE**

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Pasadena, California; my business address is Anglin, Flewelling, Rasmussen, Campbell & Trytten LLP, 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459.

On the date below, I served a copy of the foregoing document entitled:

**JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT**

on the interested parties in said case as follows:

***Served Electronically Via The Court’s CM/ECF System:***

*Counsel for Plaintiffs*  
*Yadira Diaz and Alex Delgado Bastidas*

*Counsel for Defendant*  
*Cal-Western Reconveyance, LLC*  
*[Courtesy Copy]*

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. 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. This declaration is executed in Pasadena, California on **March 16, 2015**.

\_\_\_\_\_  
Marianne Mantoen  
(Type or Print Name)

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*/s/ Marianne Mantoen*  
(Signature of Declarant)

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