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7 Attorneys for *Defendants* **SELECT PORTFOLIO SERVICING, INC. and U.S.**
BANK, N.A., SUCCESSOR TRUSTEE TO BANK OF AMERICA, N.A.,
 8 **SUCCESSOR IN INTEREST TO LASALLE BANK N.A., AS TRUSTEE, ON**
BEHALF OF THE HOLDERS OF WAMU MORTGAGE PASS-THROUGH
 9 **CERTIFICATES, SERIES 2006-AR14 (erroneously sued as U.S. Bank, N.A.)**

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

12 KAREN ALEXANDER, an individual;
 13 Plaintiff,
 14 v.
 15 JPMORGAN CHASE BANK, N A, a
 business entity, U S Bank N A, a business
 16 entity, SELECT PORTFOLIO
 SERVICING, INC, a business entity, and
 17 DOES 1 through 50, inclusive,
 18 Defendants.
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Case No.: 3:15-cv-01336-MEJ
 Hon. Mag. Judge Maria-Elena James
STIPULATION AND ~~PROPOSED~~
ORDER FOR FURTHER
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE
AND RELATED DEADLINES
 Superior Court Case No.: CIV 532673
 Action Filed: February 26, 2015
 Trial Date: N/A

22 This *Stipulation For Further Continuance of Case Management Conference*
 23 *and Related Deadlines* (the “Stipulation”) is entered into by and among *plaintiff* Karen
 24 Alexander (“Plaintiff”); *defendant* JPMorgan Chase Bank, N.A. (“Chase”); and
 25 *defendants* Select Portfolio Servicing, Inc. (“SPS”) and U.S. Bank, N.A., successor
 26 trustee to Bank of America, N.A., successor in interest to LaSalle Bank N.A., as
 27 Trustee, on behalf of the holders of WAMU Mortgage Pass-Through Certificates,
 28 Series 2006-AR14 (erroneously sued as U.S. Bank, N.A.) (“U.S. Bank,” and together

1 with Chase and SPS, the “Defendants”), by and through their respective counsel of
2 record.

3 **RECITALS**

4 A. On February 26, 2015, Plaintiff filed a complaint against Defendants in
5 the San Mateo County Superior Court. The action was subsequently removed to this
6 Court on March 23, 2015.

7 B. On March 23, 2015, the Court entered an *Order Setting Initial Case*
8 *Management Conference and ADR Deadlines* [Dkt. No. 5] wherein it set an Initial
9 Case Management Conference in this matter for June 25, 2015.

10 C. On March 27, 2015, the Court issued an *Order Referring Case to ADR*
11 *Unit for Assessment Telephone Conference* [Dkt. No. 8] (the “ADR Order”) wherein it
12 referred this case to the Court’s Alternative Dispute Resolution Unit for a telephone
13 conference to assess the case’s suitability for mediation or a settlement conference.

14 D. Pursuant to the ADR Order, on April 23, 2015, Plaintiff and Defendants,
15 through counsel, participated in a teleconference with Robin Siefkin of the Court’s
16 Alternative Dispute Resolution Unit. That meeting was then continued on several
17 occasions by agreement of the parties, most recently to September 10, 2015.

18 E. Prior to the continued conference on September 10, 2015, the parties
19 reached a settlement in principle. Since that time, they reduced their settlement to
20 writing and are in the process of executing the settlement agreement.

21 F. Based on the status of the settlement negotiations between the parties,
22 they agree that a continuance of the Case Management Conference and all related
23 deadlines will lead to a more efficient administration of this case by enabling the
24 parties to conserve resources while finalizing their settlement.

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TERMS

Pursuant to Civil Local Rule 6-2(a), the parties agree as follows:

1. The September 3, 2015 Case Management Conference shall be rescheduled for **December 10, 2015**, at **10:00 a.m.**
2. The deadline for the parties to file their Joint Case Management Statement shall be continued to and including **December 3, 2015**.
3. The deadline under Civil Local Rule 26(f) & ADR Local Rule 3-5 for the parties to meet and confer regarding initial disclosures, early settlement, ADR process selection, and a discovery plan shall be continued to and including **November 19, 2015**.
4. The deadline under Civil Local Rule 16-8(b) and ADR Local Rule 3-5(b) for the filing of the ADR Certification shall be continued to and including **November 19, 2015**.
5. The deadline under Civil Local Rule 16-8(c) and ADR Local Rule 3-5(b) & (c) for the filing of either a Stipulation to ADR Process or Notice of Need for ADR Phone Conference shall be continued to and including **November 19, 2015**.

IT IS SO STIPULATED.

[Signatures to Follow]

1 Dated: November 5, 2015

2 **McGLINCHEY STAFFORD**

3
4 By: /s/ Brian A. Paino

5 BRIAN A. PAINO

6 Attorneys for *Defendants* **SELECT**
7 **PORTFOLIO SERVICING, INC. and U.S.**
8 **BANK, N.A., SUCCESSOR TRUSTEE TO**
9 **BANK OF AMERICA, N.A., SUCCESSOR**
10 **IN INTEREST TO LASALLE BANK N.A.,**
11 **AS TRUSTEE, ON BEHALF OF THE**
12 **HOLDERS OF WAMU MORTGAGE**
13 **PASS-THROUGH CERTIFICATES,**
14 **SERIES 2006-AR14**

15 Dated: November 5, 2015

16 **BRYAN CAVE LLP**

17 By: /s/ Sharon K. Brown

18 SHARON K. BROWN

19 Attorneys for *Defendant* **JPMORGAN**
20 **CHASE BANK, N.A.**

21 Dated: November 5, 2015

22 **MELLEN LAW FIRM**

23 By: /s/ Eunji Cho

24 EUNJI CHO

25 Attorneys for *Plaintiff* **KAREN**
26 **ALEXANDER**

27 **ORDER**

28 PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 6, 2015



MARIA ELENA JAMES
United States Magistrate Judge

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

I, Brian A. Paino, attest that concurrence in the filing of this *Stipulation for Further Continuance of Case Management Conference and Other Deadlines* has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 5th day of November, 2015, at Irvine, California.

McGLINCHEY STAFFORD

/s/ Brian A. Paino
BRIAN A. PAINO
Attorneys for *Defendants* **SELECT PORTFOLIO SERVICING, INC. and U.S. BANK, N.A., SUCCESSOR TRUSTEE TO BANK OF AMERICA, N.A., SUCCESSOR IN INTEREST TO LASALLE BANK N.A., AS TRUSTEE, ON BEHALF OF THE HOLDERS OF WAMU MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-AR14**

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3 **PROOF OF SERVICE**

4 **STATE OF CALIFORNIA**)
5 **COUNTY OF ORANGE**) **ss.**

6 I, Carol Rico, declare:

7 I am employed in the County of Orange, State of California. I am over the age of 18
8 and not a party to the within action. My business address is 18201 Von Karman Ave.,
9 Suite 350, Irvine, California 92612.

10 On November 5, 2015, I served the document(s) described as: **STIPULATION AND**
11 **[PROPOSED] ORDER FOR FURTHER CONTINUANCE OF CASE**
12 **MANAGEMENT CONFERENCE AND RELATED DEADLINES** as follows:


13 **BY MAIL:** As follows:

14 **FEDERAL** – I deposited such envelope in the U.S. mail at Irvine,
15 California, with postage thereon fully prepaid,

16 **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I caused said
17 document(s) to be served by means of this Court’s Electronic transmission of
18 the Notice of Electronic Filing through the Court’s transmission facilities, to the
19 parties and/or counsel who are registered CM/ECF users set forth in the service
20 list obtained from this Court. Pursuant to Electronic Filing Court Order, I
21 hereby certify that the above documents(s) was uploaded to the website and will
22 be posted on the website by the close of the next business day and the
23 webmaster will give e-mail notification to all parties.

24 **FEDERAL:** I declare that I employed in the office of a member of the State
25 Bar of this Court at whose direction the service was made.

26 Executed on November 5, 2015, at Irvine, California.

27
28


Carol Rico

1 **SERVICE LIST**
2 **USDC, Northern District Case No. 3:15-cv-01336-MEJ**
3 **KAREN ALEXANDER v. JPMORGAN CHASE BANK, N.A., et al.**
4 **File # 104823.0152**

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