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Attorney for Plaintiffs
CHRIS ROMO AND DULIA ROMO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRIS ROMO AND MARIA DULIA

ROMO,
Plaintiffs,

v.

WELLS FARGO BANK, N.A. WELLS
FARGO HOME MORTGAGE and Does 1
through 20, inclusive,

Defendants.

CASE NO.: 3:15-cv-03708-EMC

**STIPULATION AND [PROPOSED]
ORDER RE: REVISION OF BRIEFING
SCHEDULE**

TO THE CLERK OF THE COURT AND THE HONORABLE JUDGE EDWARD M. CHEN:

Having met and conferred, Plaintiffs Chris Romo and Dulia Romo (the “plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) enter into the below stipulation and hereby request that the Court enter the accompanying proposed order.

Plaintiffs and Wells Fargo, by and through their respective counsel, jointly stipulate as follows:

1 WHEREAS, the Defendants filed a Motion to Dismiss Plaintiffs' Second Amended
2 Complaint on March 14, 2016;

3 WHEREAS the Plaintiffs intend to file an Opposition to Defendants' Motion, but
4 Plaintiffs' counsel has been involved in extensive pre-trial preparation in a matter pending in the
5 San Francisco Superior Court that is scheduled to begin trial on April 11, 2016, and is flying to
6 Washington, D.C. on Friday, April 1, 2016, to be sworn in as a member of the Bar for the
7 Supreme Court of the United States, and as a result, has not had sufficient time to prepare this
8 Opposition;

9 WHEREAS, Plaintiffs' counsel requests an additional three days to file his opposition,
10 and intends to file it on March 31, 2016;

11 WHEREAS, Defendants' counsel consents to Plaintiffs' request.

12 Pursuant to Civil Local Rule 6-2, this is the third request in this case to modify time
13 deadlines in this case. The parties do not think that this modification would have any meaningful
14 impact on the schedule for this case.

15 NOW IT IS HEREBY STIPULATED AND AGREED by and between Defendants and
16 Plaintiffs, through their undersigned counsel of record that:

- 17 1. Plaintiffs' Opposition to Defendants' Motion to Dismiss shall be filed on
18 March 31, 2016.
- 19 2. Defendants' Reply to Plaintiffs' Opposition shall be filed on April 7, 2016.
- 20 3. The hearing date on Defendants' Motion to Dismiss – April 21, 2016 – will
21 remain the same.

22 **IT IS SO STIPULATED.**
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24
25 Dated: March 28, 2016

26 /s/ Nelson W. Goodell
27 NELSON W. GOODELL,
28 Attorney for Plaintiff, CHRIS ROMO
and MARIA DULIA ROMO

1 Approved as to form and content:

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3 Dated: March 28, 2016

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/s/ Viddell Lee Heard
VIDDELL LEE HEARD,
Attorney for Wells Fargo

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CERTIFICATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that I have obtained concurrence from
Defendant's counsel for the filing of this document.

Dated: March 28, 2016

/s/ Nelson W. Goodell
NELSON W. GOODELL,
Attorney for Plaintiff

1
2 **ORDER**

3 Plaintiffs' counsel shall have until March 31, 2016, to file his Opposition to Defendants'
4 Motion to Dismiss Plaintiffs' Second Amended Complaint, and Defendants' Reply to Plaintiffs'
5 Opposition shall be filed on April 7, 2016.

6 The hearing date will remain on April 21, 2016.

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8 **IT IS SO ORDERED.**

9 Dated: March 29, 2016

