

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

1 Viddell Lee Heard (# 175049)
vheard@afrc.com
2 ANGLIN, FLEWELLING, RASMUSSEN,
CAMPBELL & TRYTTEN LLP
3 199 South Los Robles Avenue, Suite 600
Pasadena, California 91101-2459
4 Telephone: (626) 535-1900 | Facsimile: (626) 577-7764

5 Attorneys for Defendant
WELLS FARGO BANK, N.A., successor by
6 merger with Wells Fargo Bank Southwest, N.A.,
f/k/a Wachovia Mortgage, FSB, f/k/a WORLD
7 SAVINGS BANK, FSB (erroneously sued as
“Wells Fargo Home Mortgage, Inc.”)
8

9 Nelson W. Goodell, Esq.
nelson@goodelllawsf.com
THE GOODELL LAW FIRM
10 5 Third St., Suite 1100
San Francisco, California, 94103
11 Telephone: (415) 495-3950 | Facsimile: (415) 495-6900

12 Attorneys for Plaintiffs
CHRIS ROMO and MARIA DULIA ROMO
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14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

16 CHRIS ROMO and MARIA DULIA ROMO

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

17 Plaintiffs,

[The Honorable Edward M. Chen]

18 v.

**JOINT STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
CASE MANAGEMENT CONFERENCE**

20 WELLS FARGO BANK, N.A. WELLS
FARGO HOME MORTGAGE; and Does 1-20;
21 inclusive,

Current Date: June 10, 2016

22 Defendants.

Proposed Date: June 23, 2016
Time: 9:30 a.m.
Ctrm: 5 – 17th Floor

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25 **TO THE CLERK OF THE COURT AND THE HONORABLE DISTRICT JUDGE:**

26 Plaintiffs Chris Romo and Maria Dulia Romo and defendants WELLS FARGO BANK,
27 N.A., successor by merger with Wells Fargo Bank Southwest, N.A., f/k/a Wachovia Mortgage,
28 FSB, f/k/a WORLD SAVINGS BANK, FSB (erroneously sued as Wells Fargo Home Mortgage)

1 (“Wells Fargo”) enter into the below stipulation and hereby request that the Court enter the
2 accompanying proposed order. Plaintiffs and Wells Fargo jointly stipulate as follows:

3 WHEREAS, the Court originally scheduled a Case Management Conference for June 2,
4 2016 (Doc. # 31). The parties filed their Joint Case Management Statement on May 26, 2016
5 (Doc. # 39).

6 WHEREAS, On May 31, 2016, the Court continued the hearing to June 10, 2016 (Doc. #
7 40).

8 WHEREAS, counsel for Plaintiff and counsel for Wells Fargo are each unavailable on
9 June 10. Counsel for Wells Fargo has a court-ordered mediation on June 10 at 12:00 in
10 Monterey, a mediation that he must attend in person. Counsel for Plaintiff has a proposed
11 Statement of Decision and post-trial brief due on this day, which will require his attention for the
12 vast majority of this day.

13 WHEREAS, both counsel for Plaintiff and counsel for Wells Fargo are available on June
14 23, 2016.

15 **STIPULATION**

16 **NOW THEREFORE,**

17 **IT IS HEREBY STIPULATED** that the Case Management Conference be continued
18 from June 2, 2016 to June 23, 2016.

19 Respectfully submitted,

20 Dated: June 2, 2016

21 ANGLIN, FLEWELLING, RASMUSSEN,
22 CAMPBELL & TRYTTEN LLP

23 By: /s/ Viddell Lee Heard

24 Viddell Lee Heard
25 vheard@afrc.com

26 Attorneys for Defendant
27 WELLS FARGO BANK, N.A., successor by
28 merger with Wells Fargo Bank Southwest, N.A.,
f/k/a Wachovia Mortgage, FSB, f/k/a WORLD
SAVINGS BANK, FSB (“Wells Fargo”)

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Dated: June 2, 2016

Respectfully submitted,

THE GOODELL LAW FIRM

By: /s/ Nelson W. Goodell

Nelson W. Goodell

Attorneys for Plaintiffs

CHRIS ROMO and MARIA DULIA ROMO

CERTIFICATION

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

Dated: June 2, 2016

/s/ Viddell Lee Heard
VIDDELL LEE HEARD
Attorney for Defendants

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

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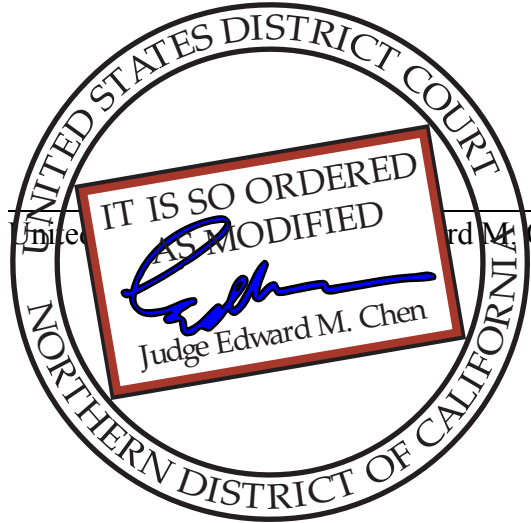
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ORDER

The Case Management Conference currently scheduled for June 10, 2016 is hereby
continued to June ³⁰~~23~~, 2016 at ^{10:30}~~9:30~~ a.m.

IT IS SO ORDERED.

Dated: 6/6/2016



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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 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459.

On June 2, 2016, I served the foregoing document entitled:

**JOINT STIPULATION AND [PROPOSED] ORDER
TO CONTINUE CASE MANAGEMENT CONFERENCE**

on the interested parties in said case as follows:

Served Via The Court’s CM/ECF System:

Attorneys for Plaintiffs:

Nelson W. Goodell, Esq.
THE GOODELL LAW FIRM
5 Third Street, Suite 1100
San Francisco, CA 94103

Tel: (415) 495-3950 Fax: (415) 495-6900

nelson@goodelllawsf.com

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 June 2, 2016.

Marianne Mantoen
(Type or Print Name)

/s/ Marianne Mantoen
(Signature of Declarant)