| | 1 2 3 4 | Viddell Lee Heard (# 175049) vheard@afrct.com ANGLIN, FLEWELLING, RASMUSSEN, CAMPBELL & TRYTTEN LLP 199 South Los Robles Avenue, Suite 600 Pasadena, California 91101-2459 Telephone: (626) 535-1900 Facsimile: (626) 5 | 77-7764 |
|---------------------------|-----------------------|---|--|
| | 5 6 7 8 9 | Attorneys for Defendant WELLS FARGO BANK, N.A., successor by merger with Wells Fargo Bank Southwest, N.A., f/k/a Wachovia Mortgage, FSB, f/k/a WORLD SAVINGS BANK, FSB (erroneously sued as "Wells Fargo Home Mortgage, Inc.") Nelson W. Goodell, Esq. nelson@goodelllawsf.com THE GOODELL LAW FIRM | |
| ર | 10 11 | 5 Third St., Suite 1100 San Francisco, California, 94103 Telephone: (415) 495-3950 Facsimile: (415) 49 | 95-6900 |
| | 12 13 | Attorneys for Plaintiffs CHRIS ROMO and MARIA DULIA ROMO | |
| ELLING NASMUSSEN CAMFBELL | 14 15 16 | UNITED STATES | |
| TE M ET. | 17 | CHRIS ROMO and MARIA DULIA ROMO | CASE NO. 3:15-cv-03708-EMC |
| | 18 | Plaintiffs, | [The Honorable Edward M. Chen] |
| NT 7 | 19 20 21 22 | v. WELLS FARGO BANK, N.A. WELLS FARGO HOME MORTGAGE; and Does 1-20; inclusive, | JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE Current Date: August 26, 2016 |
| | 23 24 | Defendants. | Proposed Case Management DateDate:September 1, 2016Time:9:30 a.m.Ctrm:5, 17th Floor |
| | 25 26 | J | ouni. 0, 170111001 |
| | 20 27 | | |
| | 28 | | |
| | | | |

CASE NO.: 3:16-CV-03708-EMC JOINT STIPULATION TO CONTINUE CMS

1 TO THE CLERK OF THE COURT AND THE HONORABLE DISTRICT JUDGE: 2 Plaintiffs Chris Romo and Maria Dulia Romo and defendants WELLS FARGO BANK, N.A., successor by merger with Wells Fargo Bank Southwest, N.A., f/k/a Wachovia Mortgage, 3 FSB, f/k/a WORLD SAVINGS BANK, FSB (erroneously sued as Wells Fargo Home Mortgage) 4 5 ("Wells Fargo") enter into the below stipulation and hereby request that the Court enter the accompanying proposed order. Counsel for Plaintiffs and Wells Fargo jointly stipulate as 6 7 follows: WHEREAS, on August 10, 2016 the parties filed a joint stipulation to continue the CMC 8 9 from August 18, 2016 to August 25, 2016. On August 12, 2016 the Court continued the CMC to August 25, 2016 (Doc # 43); 10 WHEREAS, on August 18, 2016 the Court sua sponte continued the Case Management 11 12 Conference from August 25, 2016 to August 26, 2016 (Doc # 54); 13 WHEREAS, counsel for Wells Fargo is unavailable due to a pre-set deposition in another matter on August 26, 2016. That deposition has already been delayed twice, and it cannot be 14 15 easily continued in view of the case deadlines set in that case; WHEREAS, both counsel for Plaintiff and counsel for Wells Fargo are available for a 16 17 CMC on September 1, 2016. 18 **STIPULATION** 19 NOW THEREFORE, 20 IT IS HEREBY STIPULATED that the Case Management Conference be continued from August 26, 2016 to September 1, 2016. 21 22 Respectfully submitted, 23 Dated: August 22, 2016 ANGLIN, FLEWELLING, RASMUSSEN, **CAMPBELL & TRYTTEN LLP** 24 By: /s/ *Viddell Lee Heard* 25 Viddell Lee Heard 26 vheard@afrct.com Attorneys for Defendant 27 WELLS FARGO BANK, N.A., successor by merger with Wells Fargo Bank Southwest, N.A., 28 f/k/a Wachovia Mortgage, FSB, f/k/a WORLD

2

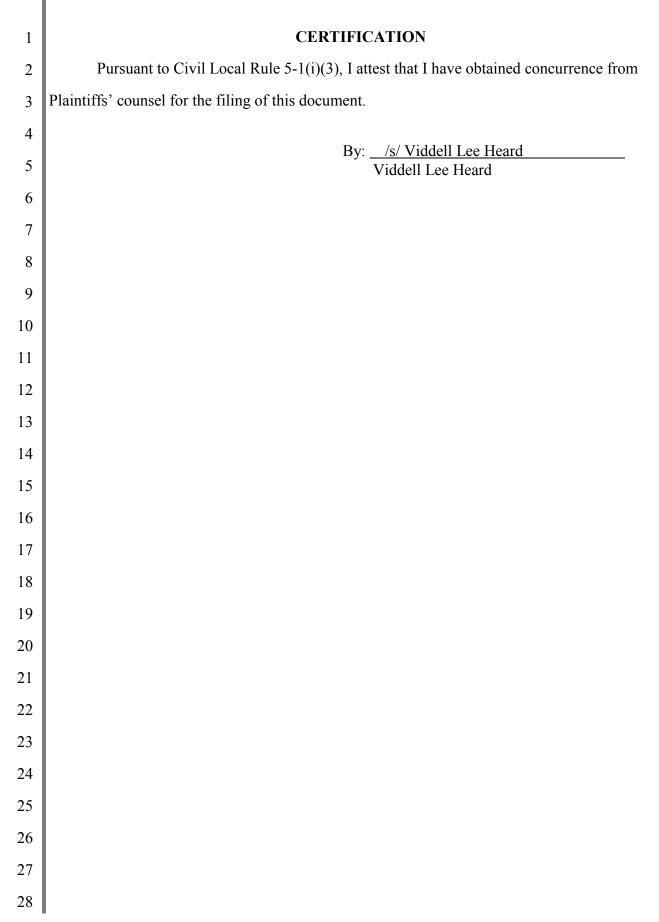
93000/BR1696/01510692-1

CASE NO.: 3:16-CV-03708-EMC JOINT STIPULATION TO CONTINUE CMS

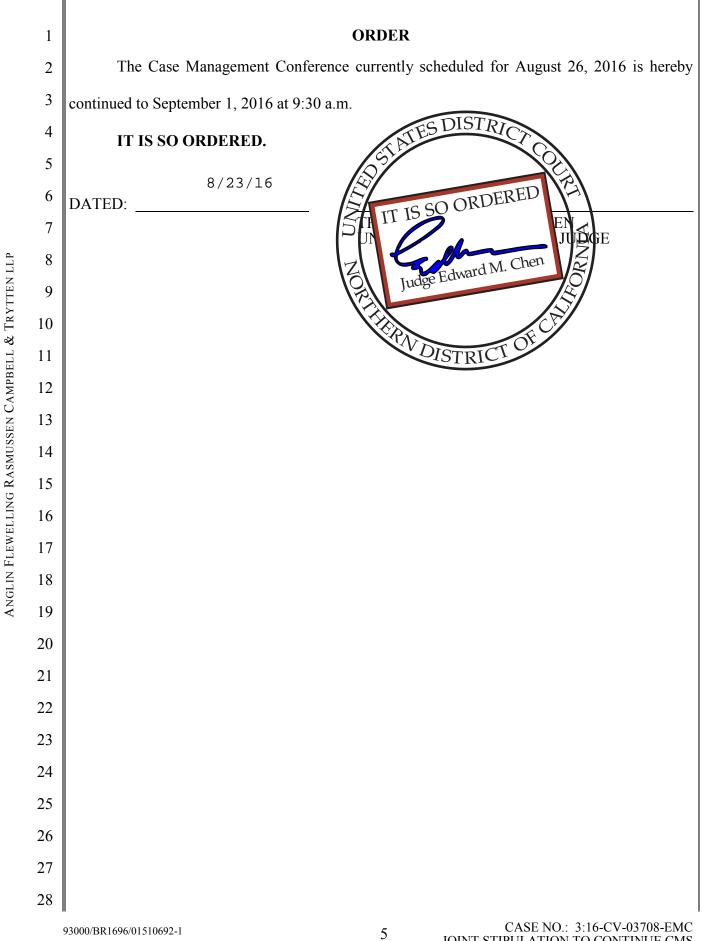
| | 1 2 | | SAVINGS BANK, FSB (erroneously sued as "Wells Fargo Home Mortgage, Inc.") Respectfully submitted, |
|--|--------|-------------------------|---|
| | 3 | Dated: August 22, 2016 | THE GOODELL LAW FIRM |
| | 4 | | |
| | 5 | | By: <u>/s/ Nelson W. Goodell</u> Nelson W. Goodell |
| | 6 | | Attorneys for Plaintiffs CHRIS ROMO and MARIA DULIA ROMO |
| | 7 | | |
| LLP | 8 | | |
| Anglin Flewelling Rasmussen Campbell & Trytten Llp | 9 | | |
| | 10 | | |
| | 11 | | |
| | 12 | | |
| | 13 | | |
| | 14 | | |
| | 15 | | |
| | 16 | | |
| | 17 | | |
| | 18 | | |
| | 19 | | |
| | 20 | | |
| | 21 | | |
| | 22 | | |
| | 23 | | |
| | 24 | | |
| | 25 | | |
| | 26 | | |
| | 27 | | |
| | 28 | | |
| | | 22000/DD1/02/01/10/02 1 | CASE NO : 3:16-CV-03708-EM |

3

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP



4



| 1 | CERTIFICATE OF SERVICE | | |
|----------|--|--|--|
| 2 | I, the undersigned, declare that I am over the age of 18 and am not a party to this action. | | |
| 3 | I am employed in the City of Pasadena, California; my business address is 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459. | | |
| 4 | On August 22, 2016, I served the foregoing document entitled: | | |
| 5 | JOINT STIPULATION AND [PROPOSED] ORDER | | |
| 6 | TO CONTINUE CASE MANAGEMENT CONFERENCE | | |
| 7 | on the interested parties in said case as follows: | | |
| 8 | Served Electronically Via The Court's CM/ECF System: | | |
| 9 | Served Electronically via The Court's CM/ECF System. | | |
| 10 | Attorneys for Plaintiffs: | | |
| 11 | Nelson W. Goodell, Esq. The Goodell Law Firm | | |
| 12 | 5 Third Street, Suite 1100 | | |
| 13 | San Francisco, CA 94103 | | |
| 14 | Tel: (415) 495-3950 Fax: (415) 495-6900 | | |
| 15 | nelson@goodelllawsf.com | | |
| 16 | | | |
| 17 | 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 | | |
| 18 | the Bar of this Court at whose direction the service was made. This declaration is executed in | | |
| 19 | Pasadena, California, on August 22, 2016. | | |
| 20 | Jill Ashley /s/ Jill Ashley | | |
| 21 | (Type or Print Name) (Signature of Declarant) | | |
| 22 | | | |
| 23 | | | |
| 24 | | | |
| 25 | | | |
| 23 26 | | | |
| 20 27 | | | |
| | | | |
| 28 | | | |

CASE NO.: 3:16-CV-03708-EMC CERTIFICATE OF SERVICE