

1 William F. Marini, Esquire #59703
2 Law Offices of William F. Marini
3 1330 East 14th Street
4 San Leandro, CA 94577
5 (510) 483-5532

6 Attorney for Plaintiffs

7 UNITED STATES DISTRICT COURT
8 OF NORTHERN CALIFORNIA

9 BENIGNO DIZON SANGALANG
10 CONNIE CUARESMA SANGALANG

Case No: 15-cv-04752-RS

11 Plaintiffs,
12 vs.

ORDER
STIPULATION TO EXTEND
DATE FOR FILING
AMENDED COMPLAINT

13 BANK OF AMERICA N.A AND PRLAP
14 INC. AND M&T BANK by BAYVIEW
15 LOAN SERVICES LLC
16 ("BAYVIEW LOAN SERVICES LLC")
17 and LAW OFFICES OF LES ZIEVE
18 ("LAW OFFICES OF LES ZIEVE")
19 AS TRUSTEE; FIRST AMERICAN TITLE
20 INSURANCE COMPANY, A CALIFORNIA
21 CORPORATION; ALL PERSONS UNKNOWN
CLAIMING ANY LEGAL OR EQUITABLE
RIGHT, TITLE, ESTATE, LIEN OR INTEREST
IN THE PROPERTY DESCRIBED IN THE
COMPLAINT ADVERSE TO PLAINTIFF'S
TITLE, OR ANY CLOUD ON PLAINTIFF'S
TITLE THERETO, AND DOES 1 - 10,

22 Defendants
23 _____/

24 This Stipulation and Agreement to extend the January 27, 2016, deadline for Plaintiffs
25 to file a First Amended Complaint is hereby entered into between Defendants, Law Offices of
26
27
28

1 Les Zieve, Bayview Loan Services LLC, and First American Title Insurance Company, a
2 California Corporation (all Defendants who have appeared thus far in the within action).

3
4 **RECITALS**

5 **WHEREAS**, Plaintiffs filed this action on October 14, 2015 in the United States
6 Federal Court, Northern District of California (Case No. 15-cv-04752-RS) alleging causes of
7 action for: 1) Violation First Security Rule, 2) Breach of Oral Contract, 3) Breach of Written
8 Contract, 4) Wrongful Foreclosure, 5) Quiet Title, 6) Slander of Title, 7) Cancellation of
9 Instruments, 8) Promissory Estoppel, 9) Negligence, 10) Negligent Misrepresentation, 11)
10 Fraud, 12) Violation of the Rosenthal Fair Debt Collection Practices, 13) Unfair Business
11 Practices Under B&P Code Section 17200 et seq, and 14) Declaratory Relief.

12
13 **WHEREAS**, on January 7, 2016, the Court granted Plaintiffs leave to file an
14 Amended Complaint and Plaintiffs were to amend the Complaint within twenty (20) days of
15 the date of the Order.

16 **WHEREAS**, Plaintiffs through their counsel William F. Marini are desirous of an
17 extension of time to complete said lengthy Amended Complaint until and through February 7,
18 2016 (ten days).

19
20 **STIPULATION**

21 **COMES NOW THE PARTIES AND HEREBY STIPULATE AS FOLLOWS:**

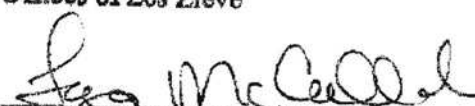
22 All parties by and through their attorneys of record, whom have appeared thus far,
23 stipulate that the deadline to file the Amended Complaint shall be extended until and through
24 February 7, 2016.

1 This Stipulation may be executed in counterpart, each of which will be considered an
2 original, but all of which together will constitute the same instrument, in order to expedite. A
3 fax copy shall be sufficient to lodge with the Court.
4

5 Dated: _____
6

Tanya McCullah, Esq.
Attorney for Defendant, Law
Offices of Les Zieve


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8
9 Dated: 1/26/2016
10


Tanya McCullah, Esq.
Attorney for Defendant, Bayview
Loan Services LLC
11
12

13 Dated: _____
14

L. Bryant Jaquez, Esq.
Attorney for Defendant
First American Title Insurance
Company
15
16

17 Dated: 1-27-2016
18


William F. Marini, Esq.
Attorney for Plaintiffs
19
20

21 PURSUANT TO STIPULATION,
22 IT IS SO ORDERED.
23

24 Dated: _____
25
26
27
28

Judge of the U.S. District Court

1 This Stipulation may be executed in counterpart, each of which will be considered an
2 original, but all of which together will constitute the same instrument, in order to expedite. A
3 fax copy shall be sufficient to lodge with the Court.
4

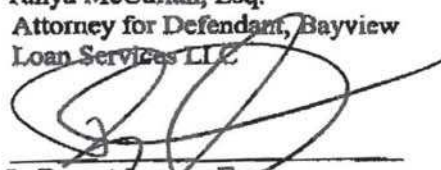
5 Dated: _____
6

Tanya McCullah, Esq.
Attorney for Defendant, Law
Offices of Les Zieve

7
8
9 Dated: _____
10

Tanya McCullah, Esq.
Attorney for Defendant, Bayview
Loan Services LLC

11
12 Dated: 1/27/16
13


L. Bryant Jaquez, Esq.
Attorney for Defendant
First American Title Insurance
Company

14
15
16
17 Dated: _____
18

William F. Marini, Esq.
Attorney for Plaintiffs

19 PURSUANT TO STIPULATION,
20

21 IT IS SO ORDERED.
22

23 Dated: 1/28/16
24


Judge of the U.S. District Court