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

13 PENNY SLINGER HILLS, an individual) Case No.: 15-cv-05108-EMC
 14 Plaintiff,)
 15 v.) **STIPULATION BETWEEN PLAINTIFF**
 16 MORTGAGE ELECTRONIC) **AND DEFENDANTS TO ACCEPT**
 17 REGISTRATION SYSTEMS, INC., a) **UNTIMELY FILED AMENDED**
 18 Delaware Corporation; CITI, a New York) **OPPOSITION TO DEFENDANTS'**
 19 Corporation, ITS SUCCESSORS AND) **MOTION TO DISMISS PLAINTIFF'S**
 20 ASSIGNS; NATIONAL DEFAULT) **AMENDED COMPLAINT; CERTIFICATE**
 21 SERVICING CORPORATION, an Arizona) **OF SERVICE**
 22 Corporation, as Trustee for BANK OF NEW)
 23 YORK as Trustee for the STRUCTURED) **Date: February 3, 2016**
 24 ASSET SECURITIES CORPORATION) **Time: 9:30 a.m.**
 25 MORTGAGE PASS-THROUGH) **Courtroom: 5, 17th Floor**
 26 CERTIFICATES, SERIES 2003-24A; and) **Honorable Judge: Edward M. Chen**
 27 DOES 1 through 50, inclusive,)
 28 Defendant(s).)

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1 IT IS STIPULATED by and between the parties, Plaintiff PENNY SLINGER
2 HILLS, and Defendants MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.;
3 CITIMORTGAGE, INC., ITS SUCCESSORS AND ASSIGNS; and BANK OF NEW YORK as
4 Trustee for the STRUCTURED ASSET SECURITIES CORPORATION MORTGAGE PASS-
5 THROUGH CERTIFICATES, SERIES 2003-24A (“Defendants”), as follows:

6 On December 17, 2015, Defendants filed their Notice of Motion and Motion to
7 Dismiss Plaintiff’s Amended Complaint (“MTD”), filed on December 2, 2015 (Docket No.
8 13)

9 Though Plaintiff timely filed her Opposition to Defendants’ MTD on December 31,
10 2015 (Docket No. 21), Plaintiff’s Counsel’s Associate, who was given the responsibility to
11 complete legal work product for Plaintiff’s Opposition to MTD was in a three-car accident
12 on highway 99 on December 27, 2015 in Madera, CA, in which his car was totaled and his
13 six-year old son was hospitalized in three different hospitals in the first 48 hours of his four-
14 day hospitalization (from December 28-December 31, 2015), in the cities of Bakersfield and
15 Madera. He attempted to complete the Opposition timely (with 3.5 hours of sleep from
16 12/28-12/31/ 2015), including the Statement of Facts, but was unable to complete the draft
17 of the Opposition to MTD by the time it was due to be filed.

18 Plaintiff filed her Amended Opposition with this Court on January 6, 2016 (Docket
19 No. 23).

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21 Defendants did not object to Plaintiff’s late filing of her Amended Opposition to
22 MTD.

23 Plaintiff and Defendants hereby stipulate that Plaintiff’s untimely filed Amended
24 Opposition to MTD be considered filed timely by this Honorable Court.

25 Defendants have no objection to the request for extension by Plaintiff for this Court to
26 consider her Amended Opposition to MTD, as filed timely.
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Defendants have already timely filed their Reply Brief with the Court as Docket No. 25.

Plaintiff has not previously received, nor requested, an extension of any kind in this case.

THEREFORE, IT IS STIPULATED that Plaintiff's Amended Opposition to MTD, which was filed on January 6, 2016, be considered timely filed by Plaintiff.

DATED: January 14, 2016

LAW OFFICES OF MARK W. LAPHAM

_____/s/_____
Mark Lapham, Esq.
Attorney for Plaintiff

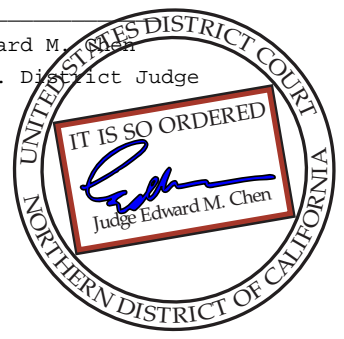
DATED: January 14, 2016

WRIGHT, FINLAY & ZAK, LLP

_____/s/_____
Todd E. Chvat
Attorney for Defendants

IT IS SO ORDERED:

Edward M. Chen
U.S. District Judge



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CERTIFICATE OF SERVICE

I certify that on January 14, 2016, I caused a copy of the foregoing to be filed electronically and that the document is available for viewing and downloading from the ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

By: /s Mark W. Lapham
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marklapham@sbcglobal.net