

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Jason W. Estavillo (Bar No. 188093)
LAW OFFICES OF JASON ESTAVILLO, PC
1330 Broadway, Suite 1030
Oakland, CA 94612
Telephone: (510) 982-3001
Facsimile: (510) 982-3002

Attorneys for Theresa M. Schoenbart

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THERESA M. SCHOENBART,)	Case No.: 3:16-CV-00070
Plaintiff,)	
vs.)	STIPULATION AND PROPOSED
JPMORGAN CHASE BANK, N.A., et al.,)	ORDER FOR EXTENSION OF
Defendants)	DEADLINES
)	Date: March 31, 2016
)	Time: 8:00 A.M.
)	Courtroom: 8, 19 th Floor

Stipulation is entered into by and between Plaintiff Theresa M. Schoenbart (“Plaintiff”), and Defendants Caliber Home Loans, Inc. (hereafter “Caliber” or “Defendants”) by and through their counsel stipulate and agree as follows:

WHEREAS, a Notice of Removal was filed January 6, 2016;

WHEREAS, Defendant Caliber Home Loans, Inc. filed a Motion to Dismiss OF February 12, 2016, which is scheduled for hearing on March 31, 2016;

WHEREAS, the current Response and Reply due dates are February 26, 2016 and March 2, 2016, respectively;

1 WHEREAS, the parties stipulate and agree that the Response and reply due dates be extended by five
2 (5) days so that the Response is due March 2, 2016 and the Reply is due March 9, 2016.

3
4 **STIPULATION**

5 IT IS THEREFORE STIPULATED AND AGREED by and between Plaintiffs and
6 Defendants, and subject to the approval of the Court, that:

- 7
8 1. The Motion to Dismiss Response and Reply deadlines will be extended by five (5) days to
9 March 2, 2016 and March 9, 2016, respectively.

10 Based upon the above the parties respectfully request that the Court approve this Stipulation
11 and sign the proposed order set forth below.
12

13 **IT IS SO STIPULATED.**

14 Dated: February 26, 2016

PERKINS COIE LLP

15
16 /s/Kristine Elizabeth Kruger

17 Kristine Elizabeth Kruger
18 Attorney for Caliber Home Loans, Inc.

19 Dated: February 26, 2016

LAW OFFICE OF JASON W. ESTAVILLO, PC

20
21 /s/Jason W. Estavillo

22 Jason W. Estavillo
23 Attorney for Theresa M. Schoenbart
24
25
26
27
28

~~PROPOSED~~ ORDER

Having read the foregoing Stipulation of the parties and GOOD CAUSE appearing

IT IS ORDERED that:

1. The Motion to Dismiss Response and Reply deadlines will be extended by five (5) days to March 2, 2016 and March 9, 2016 respectively. No more extensions will be granted.

IT IS SO ORDERED.

Dated: February 26, 2016



Judge of the District Court