

1 WHEREAS, on May 2, 2016, Defendant JPMorgan Chase Bank, N.A. ("Chase") removed
2 this matter from state court;

3 WHEREAS, pursuant to Federal Rule of Civil Procedure 81, Chase's deadline to respond
4 to the complaint is May 9, 2016; and

5 WHEREAS, Chase requires additional time to investigate the allegations in the Complaint;

6 NOW THEREFORE, Plaintiff and Chase HEREBY STIPULATE AND AGREE AS
7 FOLLOWS:

8 1. The deadline for Chase to answer, move, or otherwise respond to Plaintiff's
9 Complaint shall be extended up to and including June 9, 2016.

10 2. This stipulation will not alter the date of any event or any deadline already fixed by
11 Court order.

12 IT IS SO STIPULATED.

13

14 DATED: May 5, 2016

15 DAVIS WRIGHT TREMAINE LLP
16 Joseph Addiego
17 John D. Freed

18 By: /s/ John D. Freed
19 John D. Freed

20 Attorneys for Defendant
21 JPMORGAN CHASE BANK, N.A.

22 KETTNER LAW CORPORATION
23 Marc Applbaum

24 By: /s/ Marc Applbaum

25 Marc Applbaum

26 150 W. Washington St., Suite 104
27 San Diego, CA 92110

28 Attorneys for Plaintiff

23 Dated: 5/6/16



CERTIFICATION OF CONCURRENCE

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

Pursuant to L.R. 5-1, I hereby attest that Marc Applbaum, counsel for Plaintiff Sheri Lunsford has provided his concurrence in the electronic filing of the foregoing document entitled STIPULATION TO EXTEND TIME FOR DEFENDANT JPMORGAN CHASE BANK, N.A. TO RESPOND TO COMPLAINT PURSUANT TO CIVIL LOCAL RULE 6-1(a).

/s/ John D. Freed

John D. Freed