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Attorneys for Defendant, FRANKLIN CREDIT MANAGEMENT CORPORATION

8 **UNITED STATE DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10 DAVID FERNANDEZ, an individual and  
 11 borrower,  
 12 **Plaintiff,**  
 13 vs.  
 14 FRANKLIN CREDIT MANAGEMENT  
 15 CORPORATION, a business entity; and DOES  
 16 1 through 10 inclusive,  
 17 **Defendants.**

Case No: 3:16-cv-02837-JCS

**STIPULATION EXTENDING  
 DEADLINE TO FILE DEFENDANT’S  
 RESPONSIVE PLEADING TO  
 PLAINTIFF’S COMPLAINT**

**Pursuant to Civil L.R. 6-1**

**TO THE HONORABLE COURT AND ALL ATTORNEYS OF RECORD:**

19 **PLEASE TAKE NOTICE** that Plaintiff DAVID FERNANDEZ (“Plaintiff”), and  
 20 Defendant FRANKLIN CREDIT MANAGEMENT (“Defendant”), by and through their  
 21 respective counsel of record, do hereby stipulate and agree as follows:

- 22 1. This matter was removed to the above Court on May 26, 2016.
- 23 2. Defendant’s response to Plaintiff’s Complaint is due June 2, 2016.
- 24 3. Counsel for Plaintiff and Defendant have engaged in preliminary settlement  
 25 discussions, with the goal of providing an early resolution to this matter.
- 26 4. The Parties will require additional time to explore these settlement options, and  
 27 would like to do so while limiting fees and costs incurred in litigation at this stage.

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5. Accordingly, Plaintiff and Defendant agree that Defendant’s deadline to respond to Plaintiff’s Complaint shall be extended approximately 30 days to July 1, 2016.

Respectfully submitted,  
WRIGHT, FINLAY & ZAK, LLP

Dated: May 31, 2016

By: s/ Joshua R. Hernandez, Esq.  
Robin P. Wright, Esq.  
Joshua R. Hernandez, Esq.  
Attorneys for Defendant, FRANKLIN  
CREDIT MANAGEMENT  
CORPORATION

Respectfully submitted,  
REAL ESTATE LAW CENTER, PC

Dated: May 31, 2016

By: s/ Tala Rezai, Esq.  
Erikson M. Davis, Esq.  
Tala Rezai, Esq.  
Attorneys for Plaintiff, DAVID  
FERNANDEZ

Dated: June 2, 2016

