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 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**  
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11 NEVA B. FREEMAN, et al., individuals,  
 12 Plaintiffs,  
 13 v.  
 14 WELLS FARGO BANK, N.A., WELLS  
 FARGO HOME MORTGAGE, WELLS  
 15 FARGO HOME LENDING, QUALITY  
 LOAN SERVICE CORPORATION, and  
 16 DOES 1-50  
 17 Defendants

CASE NO.: 3:16-cv-03790-RS  
**EX PARTE STIPULATION &  
 [PROPOSED] ORDER ON MOTION and  
 BRIEFING SCHEDULE FOR  
 PLAINTIFF'S MOTION FOR  
 PRELIMINARY INJUNCTION**

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 20 Pursuant to Local Rules 65-2 and 7-2, Plaintiff Neva Freeman and Defendant Wells  
 21 Fargo Bank, N.A. (including its erroneously named divisions, Wells Fargo Home  
 22 Mortgage and Wells Fargo Home Lending) ("Defendant"), by and through their  
 23 undersigned counsel stipulate as follows:  
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25 **STIPULATION**

26 1. Plaintiff initiated her Action in the Superior Court for the County of  
 27 Sonoma on May 17, 2016 with a Verified Complaint and filed a First Amended Verified  
 28 Complaint on June 7, 2016;

1           2.       Plaintiff applied for and obtained an ex parte Temporary Restraining Order  
2 (“TRO”) from the Sonoma County Superior Court on May 25, 2016 barring defendants  
3 from conducting a non-judicial foreclosure on property located at 1448 Country Manor  
4 Drive, Santa Rosa, California (the “Property”);

5           3.       On June 13, 2016, Plaintiff and Wells Fargo stipulated to a Continuance of  
6 the TRO and the associated Order to Show Cause re: Preliminary Injunction to July 20,  
7 2016;

8           4.       Wells Fargo removed this action from the Sonoma County Superior Court  
9 on July 6, 2016;

10          5.       Wells Fargo will further postpone the foreclosure on the Property to allow  
11 Plaintiff to bring a motion for a preliminary injunction pursuant to the Federal Rules of  
12 Civil Procedure and this Court’s Local Rules;

13          6.       Plaintiff will file a motion for a preliminary injunction no later than July 20,  
14 2016 and will set the hearing on that motion no later than September 1, 2016 and Wells  
15 Fargo will postpone the non-judicial foreclosure of the Property until after September 1,  
16 2016;

17          7.       Opposition and reply briefing on the motion for preliminary injunction  
18 shall be pursuant to the Local Rules.

19          8.       By this stipulation, Wells Fargo is not agreeing to the validity or propriety  
20 of the initial TRO. This stipulation and the agreement to postpone foreclosure shall be of  
21 no force and effect if the action is dismissed prior to September 1, 2016 or remanded back  
22 to the Sonoma County Superior Court.

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1 IT IS SO STIPULATED.

2 Dated: July 19, 2016

ANGLIN, FLEWELLING, RASMUSSEN,  
3 CAMPBELL & TRYTTEN LLP

4 By: /s Robert A. Bailey  
5 Robert A. Bailey  
6 rbai1eyafrcr.com  
7 Attorneys for Defendant  
8 WELLS FARGO BANK, N.A.

9 Dated: July 19, 2016


LAW OFFICES OF RICHARD W. FREEMAN,  
10 JR.

11 By: /s Richard W. Freeman Jr.  
12 Richard W. Freeman, Jr.  
13 rfreeman@sonic.net  
14 Attorneys for Plaintiff  
15 NEVA FREEMAN

16 ~~[PROPOSED]~~ ORDER

17 GOOD CAUSE APPEARING THEREFORE FROM THE STIPULATION OF  
18 COUNSEL, IT IS SO ORDERED.

19 Dated: July 20 2016

  
20 The Honorable Richard Seeborg  
21 Judge of the District Court for the Northern  
22 District of CA  
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