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8 Attorney for Plaintiff:
 9 JANET ORTIZ

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

11 JANET ORTIZ,)	Case No. 3:16-cv-06555-RS
)	
13 Plaintiff,)	JOINT STIPULATION AND [PROPOSED]
)	ORDER TO STAY PROCEEDINGS FOR 60
14 vs.)	DAYS
)	
)	Judge: Hon. Richard Seeborg
16 WELLS FARGO BANK, N.A.,)	
)	Case Filed: 11/10/16
17 Defendant(s).)	Trial Date: TBD
)	

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 22 TO THE HONORABLE JUDGE RICHARD SEEBORG: Now Comes Plaintiff JANET
 23 ORTIZ, and Defendant, WELLS FARGO BANK, N.A., collectively, the "Parties", by and
 24 through their respective attorneys of record, and jointly stipulate and agree as follows:

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 26 RECITALS

- 27
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1. WHEREAS, Plaintiff filed the instant Complaint on November 10, 2016;
 2. WHEREAS, the Parties entered into a stipulation to extend the deadline for WELLS FARGO BANK, N.A. to respond to the Complaint. The stipulation was approved by this Court on January 10, 2017;

- 1 3. WHEREAS, the deadline for WELLS FARGO BANK N.A. to respond to Plaintiff's
2 Complaint was extended to February 21, 2017;
- 3
- 4 4. WHEREAS, the Parties have been working on a potential settlement of the case and are
5 fairly close to finalizing an agreement;
- 6
- 7 5. WHEREAS, the Parties participated in the ADR Unit's initial conference on January
8 18, 2017, and advised Mr. Howard Herman of the settlement proposal / discussions.
- 9
- 10 6. WHEREAS, the initial Case Management Conference is currently scheduled for
11 February 9, 2017;
- 12
- 13 7. WHEREAS, the Parties now wish to stay all proceedings in this matter for 60 days,
14 including all hearings, briefings, appearances and all deadlines imposed by law or by
15 the Court, to allow the Parties to hopefully finalize a settlement, without further
16 litigation.
- 17
- 18 8. WHEREAS, the Parties stipulate and agree that the instant extension request is not
19 requested for the purposes of delay and will not result in any prejudice to the Parties
20 or to the Court.

STIPULATION

- 21 9. WHEREFORE, the Parties hereby stipulate and agree that:
 - 22 a. The case be stayed until March 19, 2017; and
 - 23
 - 24 b. The deadline for WELLS FARGO BANK, N.A. to respond to Plaintiff's
25 Complaint is March 19, 2017.
 - 26

27 IT IS SO STIPULATED.
28

Dated: January 19, 2017

FARSAD LAW OFFICE, P.C.
By: /s/ Arasto Farsad
Arasto Farsad, Esq.
Attorney for Plaintiff, JANET ORTIZ

1
2 Dated: January 19, 2017

Anglin Flewelling Rasmussen Campbell & Trytten
LLP (AFRCT)

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4 By: /s/ Dennis La
Dennis La, Esq.

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6 Attorneys for Defendant
WELLS FARGO BANK, N.A.

7
8 I hereby attest that I have on file all holographic signatures corresponding to any
9 signatures indicated by a conformed signature (/S/) within this e-filed document.

10
11 /s/ Arasto Farsad
Arasto Farsad, Esq.

Dated: January 19, 2017

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15 ~~PROPOSED~~ ORDER

16 Pursuant to the instant Stipulation of the Parties, and Good Cause appearing, the
17 Court hereby orders as follows:

- 18
19 1. The case is stayed until March 19, 2017;
20 2. WELLS FARGO BANK N.A. shall respond to Plaintiff's Complaint on or
21 before March 19, 2017;
22 3. The Case Management Conference is continued to April 6, 2017 at 10:00 am

23 IT IS SO ORDERED.

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25 Dated: 1/20/17

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Honorable Richard Seeborg
Judge of the United States District Court