

1 SCOTT G. LAWSON (SBN 174671)
 JASON B. CUNNINGHAM (SBN 261559)
 2 GREENBERG TRAUIG, LLP
 153 Townsend Street, 8th Fl.
 3 San Francisco, CA 94107
 Telephone: (415) 655-1300
 4 Facsimile: (415) 707-2010
 lawsons@gtlaw.com

5 Attorneys for Defendant,
 6 MORTGAGEIT, INC.

7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**
 10 **OAKLAND DIVISION**

12 MAYDA SANCHEZ,

13 Plaintiffs,

14 v.

15 MORTGAGEIT, INC.; MORTGAGE
 16 ELECTRONIC REGISTRATION SYSTEMS,
 INC.; WELLS FARGO BANK NA dba
 17 AMERICAS SERVICING COMPANY; CAL-
 WESTERN RECONVEYANCE
 18 CORPORATION; FEDERAL HOME LOAN
 MORTGAGE CORPORATION; and DOES 1-
 19 100, inclusive,

20 Defendants.

CASE NO.: 4:10-CV-04146-PJH

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE INITIAL CASE
 MANAGEMENT CONFERENCE**

Date: January 20, 2011
 Time: 2:00 p.m.
 Courtroom: 3, 3rd Floor
 Hon. Judge Phyllis J. Hamilton

22 IT IS HEREBY STIPULATED, by and between plaintiff Mayda Sanchez and
 23 defendants MortgageIT, Inc., Wells Fargo Bank NA, and Federal Home Loan Mortgage
 24 Corporation, and subject to this Court's approval, as follows:

25 WHEREAS, the current Case Management Conference is scheduled for January 20,
 26 2011 at 2:00 p.m. in the above-captioned Court;

27 WHEREAS, on December 1, 2010, this Court heard argument concerning motions to
 28 dismiss brought by MortgageIT, Inc., Wells Fargo Bank NA, and Federal Home Loan

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

Mortgage Corporation and plaintiff Mayda Sanchez's objection to the motion to dismiss along with her proposal of filing a first amendment complaint and took those matters under submission;

WHEREAS, an order on the motions to dismiss has yet to be issued;

WHEREAS, the parties agree that it would be appropriate to continue the Case Management Conference until a date after the Court issues its order on the motions to dismiss and the pleadings in this matter are more firmly settled, and further agree that such a continuance will make the case management process more efficient; and

All parties to this action HEREBY STIPULATE that the Case Management Conference currently scheduled for January 20, 2011 at 2:00 p.m. shall be rescheduled to March 10, 2011 at 2:00 p.m. in courtroom 2, 3rd floor, of the above captioned court, or to such other date and time as the Court deems appropriate.

DATED: January 10, 2011

MAYDA SANCHEZ

By /s/ Mayda Sanchez
Mayda Sanchez
Plaintiff Pro Per

DATED: January 10, 2011

GREENBERG TRAURIG, LLP

By /s/ Jason B. Cunningham
Scott G. Lawson
Jason B. Cunningham
Attorneys for Defendant
MORTGAGEIT, INC.

DATED: January 10, 2011

SEVERSON & WERSON

By /s/ Raymond H. Cho
Raymond Hyun Cho
Attorney for Defendant
WELLS FARGO BANK NA

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

DATED: January 10, 2011

PITE DUNCAN

By /s/ Thomas N. Abbott
Thomas Nathaniel Abbott
Attorneys for Defendant
FEDERAL HOME LOAN MORTGAGE
CORPORATION

I hereby attest that I have permission from counsel and from Ms. Sanchez for any signatures indicated by a "conformed" signature (/S/) within this e-filed document.

/s/ Jason B. Cunningham

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 1/14/11



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

DECLARATION OF SERVICE

I am a citizen of the United States, over the age of 18 years, and not a party to or interested in this action. I am employed in the County of Sacramento, State of California and my business address is Greenberg Traurig, LLP, 153 Townsend Street, Eighth Floor, San Francisco, CA 95814. On this day I caused to be served the following document(s):

STIPULATION AND [PROPOSED] ORDER TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE

by placing the original a true copy into sealed envelopes addressed and served as follows:

Mayda Sanchez *Pro Per Plaintiff*
2246 Santa Maria Drive
Pittsburg, California 94565

BY MAIL: I am familiar with this firm's practice whereby the mail, after being placed in a designated area, is given fully prepaid postage and is then deposited with the U.S. Postal Service at San Francisco, California.

BY PERSONAL SERVICE: I caused such envelope to be delivered by hand.

BY OVERNIGHT COURIER: I caused such envelope to be placed for collection and delivery in accordance with standard overnight delivery procedures for delivery the next business day.

BY FACSIMILE: I caused such document(s) to be transmitted by facsimile transmission to the person(s) and facsimile transmission number(s) shown above. The facsimile transmission was reported as complete without error and a transmission report was properly issued by the transmitting facsimile machine. A true and correct copy of the transmission report will be attached to this proof of service after facsimile service is completed.

I declare under penalty of perjury under the laws of the United State that the foregoing is true and correct.

Executed on *January 10, 2011*, at San Francisco, California.



Kimberly Stratford