

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

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 BANK, N.A., successor by merger with
 Wells Fargo Bank Southwest, N.A., f/k/a
 8 Wachovia Mortgage, FSB, f/k/a World
 Savings Bank, FSB ("Wells Fargo")
 9

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 Seven-Hundred "E" Street
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14 Attorney for Plaintiff ROSEMARY GREENE

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION
 17

18 Rosemary Greene,
 19

20 Plaintiff,

21 v.
 22

23 Wells Fargo Bank, N.A.,
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25 Defendants.
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CASE NO.: 4:15-CV-00048-JSW

[The Honorable Jeffrey S. White]

**JOINT STIPULATION IN SUPPORT OF
 JOINT REQUEST TO EXTEND
 BRIEFING DEADLINES RE: WELLS
 FARGO'S MOTION TO DISMISS
 PLAINTIFF'S COMPLAINT (DOC. NO.
 12)**

**Date: March 13, 2015
 Time: 9:00 a.m.
 Ctrm: 5, 2nd Floor (Oakland
 Courthouse)**

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

1 **TO THIS HONORABLE COURT:**

2 Plaintiff Rosemary Greene (“Plaintiff”), and defendant WELLS FARGO BANK, N.A.,
3 successor by merger with Wells Fargo Bank Southwest, N.A., f/k/a Wachovia Mortgage, FSB,
4 f/k/a World Savings Bank, FSB, through their counsel of record, present the following
5 stipulation in support of their request to extend the briefing deadlines re: Wells Fargo’s motion to
6 dismiss plaintiff’s complaint.

7 **RECITALS**

8 1. WHEREAS, Plaintiff filed her complaint in the Alameda Superior Court on
9 December 11, 2014 and Wells Fargo was personally served on December 17, 2014;

10 2. WHEREAS, Defendant Wells Fargo removed the action on January 6, 2015
11 (Document No. 1);

12 3. WHEREAS, Defendant Wells Fargo filed a Motion to Dismiss Plaintiff’s
13 Complaint on January 13, 2015 (Document No. 12);

14 4. WHEREAS, pursuant to L.R. 7-3, plaintiff’s response is due no later than January
15 27, 2015 and Wells Fargo’s reply is due no later than seven days after January 27, 2015, or
16 February 3, 2015;

17 5. WHEREAS, the case was reassigned to Hon. Jeffrey S. White pursuant to Order
18 filed January 23, 2015 (Document No. 16);

19 6. WHEREAS, pursuant to the Order, the Motion was re-noticed with the Briefing
20 schedule remaining unchanged. (Document No. 18);

21 7. WHEREAS, upon the Renotice of the Complaint (Document No. 18) a new
22 response date was erroneously generated indicating plaintiff’s response was due on February 6,
23 2015 and Wells Fargo’s reply due no later than February 13, 2015;

24 8. WHEREAS, the Parties agree to extend the deadline for plaintiff’s response from
25 January 27, 2015 to February 6, 2015;

26 9. WHEREAS, Wells Fargo’s reply will be due no later than February 13, 2015;

27 10. WHEREAS, this stipulation waives no rights of either Party;

28 11. WHEREAS, the Parties have not previously stipulated to, requested, or granted.

1 an extension of the briefing deadlines to the motion to dismiss the complaint.

2 **STIPULATION**

3 **IT IS HEREBY STIPULATED** that the deadline for Plaintiff’s response to the motion
4 to dismiss complaint is extended from January 27, 2015 to February 6, 2015 and Wells Fargo’s
5 reply to the opposition will be due no later than February 13, 2015.

6
7 Dated: January 27, 2015

LAW OFFICES OF ALDON BOLANOS

8
9 By: /s/ Aldon L. Bolanos
10 Aldon L. Bolanos
aldon@aldonlaw.com
11 Attorney for Plaintiff ROSEMARY GREENE

12
13 Dated: January 27, 2015

ANGLIN, FLEWELLING, RASMUSSEN,
CAMPBELL & TRYTTEN LLP

14
15 By: /s/ Christine Hehir
16 Christine Hehir
chehir@afrc.com
17 Attorneys for Defendant WELLS FARGO BANK,
18 N.A., successor by merger with Wells Fargo Bank
Southwest, N.A., f/k/a Wachovia Mortgage, FSB,
f/k/a World Savings Bank, FSB (“Wells Fargo”)

19
20 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

21 I, E. Christine Hehir, attest that concurrence in the filing of this document has been
22 obtained from each signatory. I declare under penalty of perjury under the laws of the United
23 States of America that the foregoing is true and correct. Executed this day of January 27, 2015.

24 By: /s/ E. Christine Hehir

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

CERTIFICATE OF SERVICE

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Pasadena, California; my business address is Anglin, Flewelling, Rasmussen, Campbell & Trytten LLP, 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459.

On the date below, I served a copy of the foregoing document entitled:

JOINT STIPULATION IN SUPPORT OF JOINT REQUEST TO EXTEND BRIEFING DEADLINES RE: WELLS FARGO’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT

on the interested parties in said case as follows:

Served Electronically Via the Court’s CM/ECF System:

Counsel for Plaintiff:

Aldon L. Bolanos
Law Offices of Aldon L. Bolanos
Seven-Hundred “E” Street
Sacramento, California 95814
Tel: (916) 446-2800
Fax: (916) 446-2828

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made. This declaration is executed in Pasadena, California on January 27, 2015.

Christine Daniel

/s/ Christine Daniel

(Type or Print Name)

(Signature of Declarant)

ANGLIN FLEWELLING RASMUSSEN CAMPBELL & TRYTTEN LLP

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION

Rosemary Greene,
Plaintiff,
vs.
Wells Fargo Bank, N.A.,
Defendants.

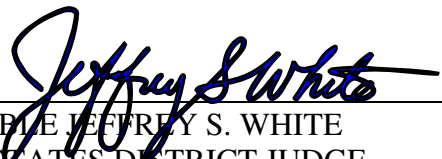
CASE NO.: 4:15-CV-00048-JSW
[The Honorable Jeffrey S. White]

**ORDER GRANTING STIPULATION TO
EXTEND BRIEFING DEADLINES RE:
WELLS FARGO’S MOTION TO DISMISS
PLAINTIFF’S COMPLAINT (DOC. NO.
12)**

The Court, having reviewed the Stipulation to extend the briefing deadlines relating to Wells Fargo’s motion to dismiss plaintiff’s complaint (Document No. 12), and GOOD CAUSE APPEARING, and PURSUANT TO STIPULATION, hereby Orders that:

The deadline for Plaintiff’s response to the motion to dismiss complaint is extended from January 27, 2015 to February 6, 2015 and the deadline for Wells Fargo’s reply is extended to February 13, 2015.

Dated: January 28, 2015


HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

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WELLS FARGO’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

on the interested parties in said case as follows:

Served Electronically Via the Court’s CM/ECF System:

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Law Offices of Aldon L. Bolanos
Seven-Hundred “E” Street
Sacramento, California 95814
Tel: (916) 446-2800
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made. This declaration is executed in Pasadena, California on January 27, 2015.

Christine Daniel

(Type or Print Name)

/s/ Christine Daniel

(Signature of Declarant)