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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA — SAN FRANCISCO DIVISION

MAURION REASE,
Plaintiff,
vs.
THE BANK OF NEW YORK MELLON;
GREEN TREE SERVICING, LLC; and DOES
1 through 50, inclusive,
Defendants.

Case No. 4:15-CV-00927-YGR

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR DISMISSAL PENDING
EFFORTS TOWARD INFORMAL
RESOLUTION**

AS MODIFIED BY THE COURT

1 Pursuant to the Order Staying Case and Continuing Compliance Hearing dated
2 November 23, 2015, the parties, plaintiff MAURION REASE, and defendants THE BANK OF
3 NEW YORK MELLON and GREEN TREE SERVICING LLC hereby stipulate that:

4 1. WHEREAS the Court stayed the case through January 22, 2016 and continued the
5 December 4, 2015 compliance hearing to January 22, 2016;

6 2. WHEREAS the Court ordered the parties to file either a stipulated dismissal or a
7 joint comprehensive proposed case schedule by January 15, 2016;

8 3. WHEREAS the parties have agreed to continue to work diligently in informally
9 settling this dispute by way of a potential short sale;

10 4. WHEREAS Plaintiff has engaged receiver Patrick Bulmer, appointed in the
11 original action (Alameda County Superior Court Case No.: RG12657382) on August 19, 2015, to
12 obtain the outstanding documents from Deborah Dean to complete a short sale package to submit
13 to Defendants;

14 5. WHEREAS the parties agree that, in the interest of facilitating settlement of this
15 action, in exchange for a stipulation to not foreclose on the Subject Property and to allow
16 sufficient time to complete and submit the short sale package, the matter shall be dismissed, with
17 prejudice, on April 15, 2016. The parties, therefore, agree as follows:

18 1. The matter shall be dismissed, with prejudice, on April 15, 2016, to allow for
19 adequate time for Plaintiff to complete preparation of a short sale package and for
20 Defendants to review Plaintiff for a short sale.

21 2. Defendants agree to not initiate foreclosure proceedings on the Subject Property
22 prior to the April 15 date for dismissal of the matter.

23 3. The parties agree to continue to work diligently and in good faith to complete the
24 short sale of the Subject Property in the event the short sale is not completed by the
25 April 15, 2016 dismissal date.
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1 DATED: January 15, 2016

LEPERA & ASSOCIATES
A Professional Corporation

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By: 

Joseph A. Lepera

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Attorneys for plaintiff MAURION REASE

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7 DATED: January 15, 2016

SEVERSON & WERSON
A Professional Corporation

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By: /s/ Megan E. Gruber

Megan E. Gruber

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Attorneys for defendants THE BANK OF NEW YORK
MELLON and GREEN TREE SERVICING LLC

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ORDER

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The Court hereby **ADOPTS** the foregoing stipulation of the parties as an Order of the Court.

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The Court further **SETS** a compliance hearing for **April 22, 2016 at 9:01 a.m.** in Courtroom 1 of
the Federal Courthouse at 1301 Clay Street, Oakland, California. If by April 15, 2016, neither
party has filed an update contesting the status of the settlement, the case shall be deemed

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DISMISSED WITH PREJUDICE and the Clerk shall vacate the compliance hearing and
administratively close the case file.

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This Order terminates Docket Number 23.

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IT IS SO ORDERED.

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DATED: January 21, 2016

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HONORABLE YVONNE GONZALEZ ROGERS
U.S. DISTRICT COURT JUDGE

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