

1 Daniel D. Murphy [California State Bar No.129100]  
 Law Offices of Daniel D. Murphy  
 2 819 Eddy Street Stadtmuller House  
 San Francisco, California 94109-7701  
 3 Telephone: (415) 771-6174  
 Email: *elderabuse@aol.com*

4 Counsel for Plaintiff Victoria Beland  
 5

6 **UNITED STATES DISTRICT COURT**  
 7  
 8 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

9  
 10 Victoria Beland, Trustee of the DORA  
 GOMEZ REVOCABLE TRUST,

11 Plaintiff,

12 vs.

13 NAPOLEON ORTIZ, a married man; JP  
 MORGAN CHASE MANHATTAN BANK,  
 14 N.A., and DOES 1-25,

15 Defendants.

CASE No. 4:17-cv-01816-HSG

Action Filed: March 31, 2017

[The Hon. Haywood S. Gilliam, Jr.]

**STIPULATION FOR PLAINTIFF TO  
 CORRECT NAME FOR THE DORA  
 GOMEZ LIVING TRUST IN SECOND  
 AMENDED COMPLAINT**

16 Trial Date: None set.

17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

1 Plaintiff Victoria Beland, Trustee of the Dora Gomez Living Trust (“Plaintiff”) and  
2 defendant JPMorgan Chase Bank, N.A. (“Defendant”), by and through their respective  
3 undersigned counsel, hereby stipulate as follows:

4 1. The Dora Gomez Living Trust was erroneously named in this action as “Dora  
5 Gomez Revocable Trust”.

6 2. Defendant agrees that Plaintiff may substitute “Dora Gomez Living Trust” in place  
7 of “Dora Gomez Revocable Trust” in the caption.

8 3. Plaintiff may file a Second Amended Complaint in the version attached hereto as  
9 Exhibit 1.

10 4. Unless otherwise addressed in this Stipulation, the court’s Order dated September  
11 19, 2017 remains unaltered.

12

13 IT IS SO STIPULATED.

14

15 DATED: October 6, 2017

LAW OFFICES OF DANIEL D. MURPHY

16

17

By:  Daniel D. Murphy   
Daniel D. Murphy  
Attorneys for Plaintiff Victoria Beland, Trustee of  
the Dora Gomez Living Trust

18

19

20 DATED: October 9, 2017

MUSICK, PEELER & GARRETT LLP

21

22

23

By:  Catherine Lee   
Catherine M. Lee  
Attorneys for Defendant JPMorgan Chase Bank,  
N.A., erroneously sued as JP Morgan Chase  
Manhattan Bank, N.A.

24

25

26

27

28

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

**ATTORNEY ATTESTATION**

I, Daniel D. Murphy, attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signature within this e-filed document. I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

DATED: October 6, 2017

Law Offices of Daniel D. Murphy

By:  Daniel D. Murphy   
Daniel D. Murphy  
Attorneys for Plaintiff Victoria Beland,  
erroneously named as Trustee of the Dora Gomez  
Revocable Trust

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: October 10, 2017

  
\_\_\_\_\_  
Hon. Haywood S. Gilliam, Jr.  
UNITED STATES DISTRICT COURT JUDGE