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 25 renamed and now  
 26 WACHOVIA MORTGAGE, a division  
 27 of Wells Fargo Bank, N.A.

28 UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA -- SAN JOSE DIVISION

21 BERNARDO REYES,	)	Case No. C08 04606 JW
	)	
22 Plaintiff,	)	[Hon. James Ware, District Judge]
	)	
23 v.	)	JOINT STIPULATION FOR ORDER TO
	)	TAKE THE DEPOSITION OF STEPHEN
24 _____	)	SATISH DASS
25 PREMIER HOME FUNDING, INC., a	)	
26 California corporation; WORLD SAVINGS	)	Trial Date: May 12, 2010
27 BANK, FSB; WACHOVIA BANK, N.A.;	)	
28 and JOEL MADERA CANDELARIO,	)	
Defendants.	)	

1 The parties hereby stipulate by and through their respective counsel as follows:

2 1. All parties request that the Court lift the discovery cut-off date and grant them  
3 permission to take the deposition of Stephen Satish Dass ("Mr. Dass"). Counsel have agreed to a  
4 deposition of Mr. Dass on April 27, 2010, to take place in Orange County, California. Counsel  
5 for Plaintiff may participate by telephone.

6 2. Mr. Dass's testimony is believed to be central to issues in this matter. His  
7 signature is on Plaintiff's loan application generated by the defendant broker, Premier Home  
8 Funding, Inc. ("Premier"), which is alleged by Plaintiff to contain inflated income figures.  
9 Further, Mr. Dass is believed to be or have been the Chief Executive Officer of Premier at all  
10 pertinent times.

11 3. Mr. Dass was only recently located by the efforts of an investigator hired by  
12 counsel for Defendant Wachovia, and the personal efforts of its counsel, Fred Hickman. Not until  
13 Wednesday March 31 did counsel Hickman obtain from Mr. Dass a usable address for service of  
14 process.

15 Dated: April 13, 2010

ANGLIN, FLEWELLING, RASMUSSEN  
CAMPBELL & TRYTTEN LLP

17 By: /s/ Fred Hickman

Fred Hickman  
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18 Attorneys for Defendant and Cross-Complainant  
19 World Savings Bank, renamed and now a division  
20 of Wells Fargo Bank, N.A.

21 Dated: April 13, 2010

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26 BERNARDO REYES

27 [signatures continued next page]  
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**ORDER**

For good cause shown by the parties' Joint Stipulation For Order To Take The Deposition  
Of Stephen Satish Dass,

IT IS ORDERED THAT:

The discovery cut-off is extended to allow the deposition of Stephen Satish Dass.

Dated: 4/15/10



United States District Judge  
Magistrate