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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE BRANCH

OSCAR MADRIGAL SENCION, an)
individual,)
)
Plaintiff,)

CASE NO.: 5:10-cv-03108-JF
)
Hon: Jeremy Fogel
)

vs.)

STIPULATION AND {PROPOSED}
ORDER CONTINUING DEADLINE TO
COMPLETE SETTLEMENT
CONFERENCE

SAXON MORTGAGE SERVICES, INC.; a)
business of unknown form; OCWEN LOAN)
SERVICING, LLC, a business of unknown)
form; DEUTSCHE BANK NATIONAL)
TRUST COMPANY, a business of unknown)
form, and DOES 1 through 100, inclusive,)
)
Defendants.)

1 The parties hereby stipulate as follows and respectfully request that the Court enter the
2 proposed order set forth below.

3 WHEREAS on March 18, 2011 the parties, Plaintiff Oscar Madrigal Sencion (“Plaintiff”),
4 Defendant Saxon Mortgage Services, Inc., (“Saxon”) and Defendant Ocwen Loan Servicing, LLC
5 (“Ocwen”), stipulated to continue the deadline to complete settlement conference ,to May 31,
6 2011 which stipulation was approved by the Court; and

7
8 WHEREAS in so stipulating to the continuance to May 31, 2011 the Plaintiff indicated he
9 intended to submit financial and other documents to Ocwen sufficiently in advance of the May
10 31, 2011 deadline (30-45 days) for Ocwen to complete its review for a loan
11 modification/reinstatement. The parties indicated in the stipulation that a settlement conference
12 would be unlikely to result in a settlement unless this occurred; and

13
14 WHEREAS, Plaintiff has failed to submit any documents to Ocwen for its review for a
15 loan modification, necessitating another continuance of the deadline to complete settlement
16 conference; and

17
18 WHEREAS, the parties have agreed to conduct the settlement conference on July 19,
19 2011, at 10:00 a.m., or the soonest time and date thereafter upon which Magistrate Judge Lloyd is
20 able to conduct the conference. .

21
22 WHEREAS, Plaintiff has agreed to forward all necessary financial documentation to
23 counsel for Ocwen not later than May 15, 2011; so that Ocwen has sufficient time to complete its
24 review for a loan modification/reinstatement prior to the settlement conference date.

25 NOW, THEREFORE, the Parties stipulate and agree as follows:

26 1. The deadline to complete the settlement conference shall be continued from May
27 31, 2011 to August 15, 2011. The settlement conference will be held on July 19, 2011, at 10:00
28

1 a.m., or the soonest time and date thereafter upon which Magistrate Judge Lloyd is able to
2 conduct the conference. Plaintiff will provide all requested financial documentation to counsel for
3 Ocwen not later than May 15, 2011.

4 IT IS SO STIPULATED.

5 ///

6 Dated: May 9, 2011

CENTURY LAW GROUP, LLP

8 /s/ Rizza Gonzales

9 Edward O. Lear
10 Rizza Gonzales
11 Attorneys for Plaintiff
12 Oscar Madrigal Sencion

13 Dated: May 9, 2011

WOLFE & WYMAN, LLP

14 /s/ Marcus T. Brown

15 Marcus T. Brown
16 Attorneys for Defendant
17 Saxon Mortgage Services, Inc. and
18 Deutsche Bank National Trust
19 Company, Trustee and Custodian
20 Natixis Real Estate Capital Trust
2007-HE Mortgage Pass-Through
Certificates, Series 2007-HE2

21 Dated: May 9, 2011

HOUSER & ALLISON, APC

22 /s/ Brian Edwards

23 Eric D. Houser
24 Brian S. Edwards
25 Attorneys for Defendant
26 Ocwen Loan Servicing, LLC
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[PROPOSED] ORDER

Based upon the foregoing stipulation and good cause appearing, the Court ORDERS that the deadline for the parties to complete a settlement conference with Magistrate Judge Lloyd is hereby CONTINUED to and including August 15, 2011.

IT IS SO ORDERED.

Dated: 5/11/11



Hon. Jeremy Fogel
United States District Court Judge
United States District Court, Northern District of
California