

1 THOMAS A. WOODS (SB #210050)
 2 thomas.woods@stoel.com
 3 TIFFANIE C. DE LA RIVA (SB #309092)
 4 tiffanie.delariva@stoel.com
 5 STOEL RIVES LLP
 500 Capitol Mall, Suite 1600
 Sacramento, CA 95814
 Telephone: 916.447.0700
 Facsimile: 916.447.4781

6 Attorneys for Defendant
 7 SELECT PORTFOLIO SERVICING, INC.



8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN JOSE DIVISION

11 PABLO T. RATUITA and LOURDES
 12 RATUITA,
 13 Plaintiffs,
 14 v.
 15 SELECT PORTFOLIO SERVICING, INC.;
 16 JPMORGAN CHASE BANK, N.A.; and
 17 DOES 1 through 50, inclusive,
 Defendants.

Case No. 5:16-CV-07254-HRL
JUDGE: Hon. Howard R. Lloyd
**FURTHER STIPULATION TO
 EXTEND TIME FOR DEFENDANT TO
 RESPOND TO COMPLAINT**
ACTION FILED: November 18, 2016
REMOVED: December 21, 2016
 Re: Dkt. 21

18
 19 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, AND TO ALL PARTIES AND**
 20 **THEIR ATTORNEYS OF RECORD:**

21 This stipulation (“Stipulation”) is entered into by the undersigned counsel for defendant
 22 Select Portfolio Servicing, Inc. (“SPS” or “Defendant”) and the undersigned counsel for plaintiffs
 23 Pablo T. Ratuita and Lourdes Ratuita (“Plaintiffs”) (together with SPS, the “Parties”).

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

RECITALS

WHEREAS, on November 18, 2016, Plaintiffs filed a Complaint in Santa Clara County Superior Court in the case entitled *Ratuuta v. Select Portfolio Servicing, Inc., et al*, Case No. 16CV302844.

WHEREAS, on December 20, 2016, Defendant SPS filed a Notice of Removal with this Court.

WHEREAS, Defendant’s response is currently due March 27, 2017.

WHEREAS, two previous extensions have been sought and granted.

WHEREAS, the parties have been engaged in good faith negotiations and continue to work towards early resolution of the matter. Proceeding with litigation at this stage would be costly and create an unnecessary burden on the Courts and Parties, and Parties believe good cause exists for a proposed continuance so Parties can continue to work towards settlement.

WHEREAS Plaintiffs and Defendant, by and through their counsel of record, hereby STIPULATE to an additional thirty (30) day extension of time for Defendant to respond to Plaintiffs’ Complaint. This will provide the time necessary for parties to continue to engage in meaningful settlement discussions and attempt to informally resolve the matter.

FOR GOOD CAUSE APPEARING, THE PARTIES STIPULATE AS FOLLOWS:

- 1. The date by which Defendants shall respond to Plaintiffs’ Complaint shall be extended to April 26, 2017.
- 2. All related deadlines shall be continued accordingly.

IT IS SO STIPULATED.

//
//
//
//
//
//
//
//

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

DATED: March 24, 2017

STOEL RIVES LLP

By: /s/Tiffanie C. de la Riva
THOMAS A. WOODS
TIFFANIE C. DE LA RIVA
Attorneys for Defendant
SELECT PORTFOLIO SERVICING, INC.

DATED: March 24, 2017

THE PABST LAW FIRM

By: /s/ Frank Pabst
FRANK PABST
Attorney for Plaintiffs
PABLO T. RATUITA AND LOURDES
RATUITA

ATTESTATION OF SIGNATURE:

I attest under penalty of perjury under the laws of the United States of America that I have received the concurrence in the filing of this document from the listed signatories as required by Local Rule 5.1(i)(3).

Dated: March 24, 2017

/s/ Tiffanie C. de la Riva
TIFFANIE C. DE LA RIVA