

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ANNEMARIE CRONIN,

Plaintiff,

vs.

BANK OF AMERICA,

Defendant.

Case No. 2:12-cv-13249-RHC-MAR

District Court Judge Hon. Robert H. Cleland

Magistrate Judge Hon. Mark A. Randon

LAVASSEUR DYER & ASSOCIATES, P.C.
Allen J. Dyer (P54857)
P.O. Box 721400
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Attorney for Plaintiff

DYKEMA GOSSETT PLLC
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Attorneys for Defendant

STIPULATED ORDER TO STAY LITIGATION

Plaintiff Annemarie Cronin (“Plaintiff”) and Defendant Bank of America, N.A. (“Defendant”), having stipulated hereto, as is evidenced by the signatures of their respective counsel below, the Court being otherwise fully advised, and the parties acknowledging the following:

1. Defendant has agreed to attempt to determine Plaintiff’s eligibility for a loan modification which, if eligible, could lead to an amicable dismissal of all claims made in this lawsuit;
2. Plaintiff has agreed to produce information and documents necessary for a loan modification review to commence;

3. The parties desire to stay the litigation through **November 2, 2012**, in order to allow the review to be completed without incurring costs and fees associated with litigating the claims at issue in this lawsuit; and

4. The parties acknowledge that while Defendant has agreed to review Plaintiff's loan for a possible modification, there is no guarantee that such modification will be approved or offered:

IT IS HEREBY ORDERED that, except as otherwise provided in this Order, the proceedings shall be stayed for all purposes, including discovery, through November 2, 2012, to allow for the possible resolution of this matter, pending the outcome of the loan modification review.

IT IS FURTHER ORDERED that all current scheduled dates, including the October 10, 2012 hearing on Defendant's Motion to Dismiss, are hereby adjourned.

IT IS FURTHER ORDERED that Plaintiff shall have until September 21, 2012, to return a completed loan modification application, including all requested information and documents, to Defendant through its counsel so that Defendant may conduct a loan modification review. Plaintiff shall also provide any further requested information within 5 business days of any such request;

IT IS FURTHER ORDERED that if any party believes that a settlement is no longer viable, including, but not limited to, failure by Plaintiffs to produce a completed loan modification application by September 21, 2012, then any party may serve a proposed order ending the stay.

IT IS FURTHER ORDERED that, if the stay expires without a resolution to this lawsuit having been reached, counsel for the parties shall appear for a status conference before this Court

on **November 6, 2012, at 10:00 am**, at which time the Court will set a hearing on Defendant's pending Motion to Dismiss.

IT IS SO ORDERED.

s/Robert H. Cleland
HON. ROBERT H. CLELAND

SO STIPULATED:

LAVASSEUR DYER & ASSOCIATES, P.C.

By: /s/Allen J. Dyer (with consent)
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Dated: September 14, 2012