Case 2:17-cv-00882-JLR Document 17 Filed 09/12/17 Page 1 of 3 1 THE HONORABLE JAMES L. ROBART 2 John A. Cochran, OSB No. 020022 3 PACIFIC PROPERTY LAW LLC Pacific Property Law LLC 4 8802 NE Hwy 99, Ste. B, #64 Vancouver, WA 98665 5 Telephone: 503.756.0299 E-mail; johnpplllc@gmail.com 6 Attorneys for Plaintiffs 7 8 UNITED STATES DISTRICT COURT 9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 10 11 Case No. C17-0882JLR PAUL J. BECK, et. al. 12 UNOPPOSED MOTION Plaintiff, 13 FOR EXTENSION OF TIME TO RESPOND TO v. 14 BAYVIEW MOTION TO DISMISS SECOND AMENDED COMPLAINT US BANK NATIONAL ASSOCIATION, et 15 AND GROBE 16 Defendant. 17 .. 18 **STIPULATION** 19 Comes now Plaintiffs, Paul Beck and Lin O. Beck, appearing through counsel, John A. 20 Cochran and moves the Court for a Motion for Extension to Respond to Defendant's Motion to 21 Dismiss Becks' Complaint. Defendant filed a motion to dismiss Plaintiff's complaint on 22 August 11, 2017. Plaintiff asks the Court for an extension of time to respond to said 23 Defendants' Motion to Dismiss for the following reasons: 24 1. 25 26 and trial throughout last few weeks of August and First week of September.

Plaintiff's Attorney had family emergency out of state and also several critical deadlines

27

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO US BANK NA'S MOTION TO DISMISS. BECK'S COMPLAINT - 1

PACIFIC PROPERTY LAW LLC 8802 NE HWY 99, STE. B, #64 VANCOUVER WASHINGTON 98665 503.756.0299 E-MAIL: johnpplllc@gmail.com 3

5 6

7

8

10

11 12

13

14

15

16

17

18

19

20

21 22

23

24

2526

27

In effect, because of these various conflicts, it made it difficult to respond in full by the deadline for Plaintiff's response to Defendant's Motion to Dismiss. Additionally, Mr. Cochran and Mr. Laurick are attempting to discuss a settlement proposal consisting of cash for keys and a short sale and/or the latest temporary payment plan terms but have not come to terms on any exact proposal yet.

4.

Mr. Cochran has communicated that he needs an extension to Mr. Laurick, Counsel for Defendant and Mr. Laurick had no objection and did not oppose Mr. Cochran's request for extension to respond to Defendant's Motion to Dismiss. Mr. Laurick agreed to a two-week extension date of Tuesday, September 26, 2017.

5.

Defendants' counsel, James Laurick and Plaintiff's counsel, John A. Cochran have conferred and agree to set the Extension of the deadline to Respond to the Motion to Dismiss to Tuesday, September 26, 2017.

6.

Therefore, Plaintiff requests for an extension to Respond to Defendants' Motion to Dismiss to Tuesday, September 26, 2017.

Dated September 12, 2017

/s/ John A. Cochran, OSB No. 020022 johnppllle@gmail.com Pacific Property Law LLC 8802 NE Hwy 99, Ste. B, #64 Vancouver, WA 98665 Telephone: 503-756-0299 IT IS THEREFORE ORDERED:

ORDER:

Plaintiff is hereby granted an Extension of Time to Respond to Defendants' Motion to Dismiss until Tuesday, September 26, 2017.

DATED: September 12, 2017

HONORABLE JAMES L, ROBART

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO US BANK NA'S MOTION TO DISMISS BECK'S COMPLAINT - 3

PACIFIC PROPERTY LAW LLC 8802 NE HWY 99, STE. B, #64 VANCOUVER WASHINGTON 98665 503,756.0299 E-MAIL: johnpplllc@gmail.com