

The Honorable James L. Robart

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SEBAHAT DIVSAR AND ERAJ DIVSAR,

Plaintiffs,

v.

QUALITY LOAN SERVICE CORP. OF
WASHINGTON, INC.; WELLS FARGO
BANK, N.A.; and DOE DEFENDANTS 1
through 20,

Defendants.

NO. 2:17-cv-01065-JLR

**STIPULATION REGARDING
MOTION FOR PRELIMINARY
INJUNCTION, AND ORDER
THEREON [PROPOSED]** *JLR*

NOTE ON MOTION CALENDAR:
JULY 27, 2017

I. STIPULATION

Plaintiffs Sebahat Divsar and Eraj Divsar (the "Divsars"), Defendant Quality Loan Service Corp. of Washington ("QLS"), and Defendant Wells Fargo Bank, N.A. ("Wells Fargo"), by and through their respective attorneys of record, pursuant to LCR 67(a), hereby agree and stipulate as follows:

1. That any foreclosure of the property which is the subject of this litigation, judicial and non-judicial, based on the Deed of Trust at issue herein, including the

109300/FR0022/01805814-1
STIPULATION RE MOTION FOR
PRELIMINARY INJUNCTION AND
ORDER THEREON [PROPOSED] - 1

CASE NO.: 2:17-cv-01065-JLR

ANGLIN FLEWELLING RASMUSSEN
CAMPBELL & TRYTTEN LLP
701 PIKE STREET, SUITE 1560
SEATTLE, WASHINGTON 98101
PHONE: 206/492-2300

1 Trustee's Sale currently scheduled to be held in King County, Washington, which was
2 initiated by QLS at the behest of Wells Fargo asserting itself as the Beneficiary, is hereby
3 enjoined and may not proceed, if at all, until further order of this Court;

4 2. That the Divsars shall deposit \$1,534.51 into the Court Registry on or
5 before the 29th day of each month hereafter so long as this Order is in effect and shall
6 provide proof of such deposit to all parties of record in this suit. If the Divsars fail to
7 deposit the money in a timely manner as provided herein, any party seeking to dissolve this
8 Order may move this Court, after providing notice to all parties of such action, and request
9 to foreclose pursuant to RCW 61.24 and other applicable laws; and

10 3. That upon entry of an Order hereon, the parties shall file a Stipulated
11 Motion for Disbursement of Funds in the King County Superior Court and request entry of
12 an Order thereon which provides that all funds paid by the Divsars and currently held in
13 the Registry of the King County Superior Court concerning this action be transmitted to
14 the Registry of this Court for disposition pursuant to this Order.

15 **IT IS SO STIPULATED** this 27th day of July, 2017.

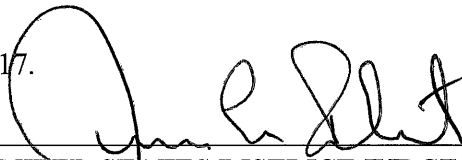
<p>16 <u>/s/ Melissa A. Huelsman</u> 17 Melissa A. Huelsman, WSBA # 30935 18 LAW OFFICES OF MELISSA A. 19 HUELSMAN, P.S. 20 705 Second Avenue, Suite 601 21 Seattle, WA 98104 22 Phone: (206) 447-0103 23 Email: 24 <u>mhuelsman@predatorylendinglaw.com</u> 25 <i>Attorneys for Plaintiffs</i></p>	<p><u>/s/ Barbara L. Bollero</u> Barbara L. Bollero, WSBA # 28906 AFRCT, LLP 701 Pike Street, Suite 1560 Seattle, WA 98101 Phone: (206) 492-2300 Email: <u>bbollero@afrc.com</u> <i>Attorneys for Defendant Wells Fargo Bank, N.A.</i></p>
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<p>1 /s/ <i>Robert W. McDonald</i> Robert W. McDonald, WSBA # 43842 2 Quality Loan Service Corp. of Washington 3 108 1st Ave. S., Suite 202 Seattle, WA 98104 4 Phone: (206) 596-4862 Email: rmcdonald@qualityloan.com 5 <i>Attorneys for Defendant QLS</i></p>	
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7 **II. ORDER ON STIPULATION**

8 IT IS SO ORDERED.

9 Dated this th 27 day of July, 2017.



10 _____
 11 UNITED STATES DISTRICT JUDGE
 12 JAMES L. ROBERT
 13

14 Presented by, Approved as to Form, and
 15 Notice of Presentation Waived:

<p>16 /s/ <i>Melissa A. Huelsman</i> Melissa A. Huelsman, WSBA # 30935 17 LAW OFFICES OF MELISSA A. HUELSMAN, P.S. 18 705 Second Avenue, Suite 601 Seattle, WA 98104 19 Phone: (206) 447-0103 Email: 20 mhuelsman@predatorylendinglaw.com <i>Attorneys for Plaintiffs</i></p>	<p>21 /s/ <i>Barbara L. Bollero</i> Barbara L. Bollero, WSBA # 28906 22 AFRCT, LLP 701 Pike Street, Suite 1560 Seattle, WA 98101 23 Phone: (206) 492-2300 Email: bbollero@afrc.com <i>Attorneys for Defendant</i> <i>Wells Fargo Bank, N.A.</i></p>
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<p><u>/s/ Robert W. McDonald</u> Robert W. McDonald, WSBA # 43842 Quality Loan Service Corp. of Washington 108 1st Ave. S., Suite 202 Seattle, WA 98104 Phone: (206) 596-4862 Email: rmcdonald@qualityloan.com <i>Attorneys for Defendant QLS</i></p>	
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CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

Melissa A. Huelsman MELISSA A. HUELSMAN, P.S. 705 Second Avenue, Suite 601 Seattle, WA 98104 <i>Attorneys for Plaintiffs</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input type="checkbox"/> By Email <input checked="" type="checkbox"/> By CM/ECF E-Service
Robert McDonald QUALITY LOAN SERVICE CORP. OF WASHINGTON 108 1 st Avenue S., Suite 202 Seattle, WA 98104 <i>Attorneys for Defendant Quality Loan Service Corp. of Washington</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input type="checkbox"/> By Email <input checked="" type="checkbox"/> By CM/ECF E-Service

Signed this 27th day of July, 2017, at Seattle, Washington.

/s/ Kay Spading
Kay Spading, Legal Assistant
AFRCT, LLP