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7 Attorneys for Defendant,  
 8 DFT, Inc. d/b/a The Cannon  
 Management Company

9 **UNITED STATES DISTRICT COURT**  
 10 **DISTRICT OF NEVADA**

11 COPPER SANDS HOMEOWNERS )  
 12 ASSOCIATION, INC., a Nevada non-profit )  
 corporation; MARCIA JARRETT; CHARLES )  
 13 WOOD; RICHARD DRESSLER; RICHARD )  
 EMANUEL; PAUL DOYLE; ARLENE )  
 14 MARENTIC; BOJAN NENADIC; EVERETT F. )  
 CROXSON; MYRA SCHULTZ; STEVEN )  
 15 GAZZA; MILORAD JAGROVIC; DAVID G. )  
 FERGUSON; JANE SOO HOO LUI; XUI YI )  
 16 QIU; DORON GERBY; CATALIN NISTOR; )  
 and HILARY GARBER, on their own behalf and )  
 17 on behalf of all others similarly situated; and )  
 POE HOMEOWNERS 1-2000, )  
 18  
 Plaintiffs, )

Case No.: 2:10-cv-00510-GMN-NJK

**STIPULATED REQUEST AND  
 ORDER TO EXTEND TIME FOR  
 SUBMISSION OF A PROPOSED  
 JOINT PRE-TRIAL ORDER**

**(Second Request)**

19 vs.

20 COPPER SANDS REALTY, LLC, a Delaware )  
 21 limited liability company; ROBERT COLUCCI, )  
 an individual; DARIO DELUCA, an individual, )  
 22 a/k/a DARIO DE LUCA; CBC INVESTMENTS, )  
 INC., a Nevada corporation; JIM CERRONE, an )  
 23 individual; COMPLEX SOLUTIONS, LIMITED, )  
 a Nevada limited liability company; COPPER )  
 24 SANDS INVESTORS LP, a Nevada limited )  
 partnership; COUNTRYWIDE HOME LOANS, )  
 25 INC., a New York Corporation; CS )  
 CONSULTING SERVICE, LLC, a Nevada )  
 26 limited liability company; TERESA CUSHMAN, )  
 an individual; RENATO DELUCA, an )  
 27 individual, a/k/a RAY DELUCA and RAY DE )  
 LUCA; DFT, INC., a California corporation, )  
 28 d/b/a THE CANNON MANAGEMENT )

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1 COMPANY; SHAWN HEYL, an individual; )  
 2 LYNDA HOANG, an individual; IRWIN )  
 3 MORTGAGE CORPORATION, an Indiana )  
 4 corporation; BRENT JONES, an individual; )  
 5 BRENT JONES SERVICES, INC., a Nevada )  
 6 corporation; MANIETTA ELECTRIC, INC., a )  
 7 California corporation, MORTGAGE LOAN )  
 8 SPECIALISTS, INC., a California corporation; )  
 9 PACIFICA ENTERPRISES HOLDINGS LP, a )  
 10 California limited partnership; PACIFICA )  
 11 ENTERPRISES, INC., a California corporation, )  
 12 PACIFICA ENTERPRISES LLC, a Nevada )  
 13 limited liability company; PACIFICA )  
 14 MARKETING SERVICES, LLC, a Nevada )  
 15 limited liability company; PACIFICA )  
 16 MARKETING SERVICES, LLC, a Nevada )  
 17 limited liability company d/b/a "CONDO )  
 18 CLUB", "CONDO CLUB LAS VEGAS", and )  
 19 "CONDO CLUB - LAS VEGAS"; PACIFICA )  
 20 REAL ESTATE INVESTMENTS, INC., a )  
 21 California corporation; PACIFICA REAL )  
 22 ESTATE SERVICES, INC., a California )  
 23 corporation; PLASTER DEVELOPMENT )  
 24 COMPANY, INC., a Nevada corporation, d/b/a )  
 25 "SIGNATURE HOMES" and "SIGNATURE )  
 26 HOMES, INC."; PREMIER COMMUNITIES, )  
 27 INC., a Nevada corporation; PREMIER )  
 28 FINANCIAL, LLC, a California limited liability )  
 company; PREMIER REALTY SERVICES, )  
 INC., a California corporation; PREMIER )  
 RESIDENTIAL, INC., a California corporation; )  
 VIMARK RE ENTERPRISES LLC, a California )  
 limited liability company; DOES 1-100; )  
 inclusive; ROE CORPORATIONS 1-100, )  
 inclusive; ROE BUSINESS ENTITIES 1-100, )  
 inclusive; and ROE GOVERNMENTAL )  
 ENTITIES 1-20, inclusive, )  
 Defendants. )

21  
 22 THERE BEING A STIPULATION AND AGREEMENT BETWEEN THE PARTIES,  
 23 THE PARTIES HEREBY SUBMIT THIS STIPULATED REQUEST AND ORDER for extension  
 24 of time for submission of the proposed joint pre-trial order, by and between Plaintiff, by its counsel  
 25 of record, Terry L. Wike Esq., of LAW OFFICES OF TERRY WIKE, and Defendant, the DFT,  
 26 INC. d/b/a The Cannon Management Company (hereinafter "Cannon" or "Cannon Management"),  
 27 by and through its attorneys of record, Peter C. Brown, Esq., and Karen M. Baytosh, Esq., of the  
 28 law firm of Bremer, Whyte, Brown & O'Meara, LLP, and Andrew C. Green, Esq., of the law firm

1 KOELLER NEBEKER, CARLSON & HALUCK, LLP, and the parties stipulate and request  
2 extension of time as follows and for the reasons stated below:

3 The parties request a two week extension of time for submission of a proposed joint pre-  
4 trial order; the requested extension seeks a new deadline for submission of a proposed joint pre-  
5 trial order as follows:

6 <b>Event</b>	<b>Prior Deadline</b>	<b>Proposed New Deadline</b>
7 Submission of Proposed Joint Pre-Trial Order	August 28, 2015	September 11, 2015

8 Plaintiff specifically requests the extension of time due to scheduling conflicts impairing the  
9 ability of counsel for Plaintiff to meaningfully coordinate with counsel for Cannon Management  
10 for preparation of the joint pre-trial order, including identification of witnesses and exhibits as well  
11 as attempting stipulations regarding presentation or reference to same during trial. In particular,  
12 counsel for Plaintiff is also counsel for fourteen (14) Plaintiffs in the separate matter of *Seneca*  
13 *Falls V Homeowners Association et al. v. Heller Development Company et al.*, pending in  
14 Department 16 of the Eighth Judicial District Court of Nevada, Clark County Case #A669475  
15 (hereinafter "*Seneca Falls matter*"); which is currently rapidly advancing towards trial with pre-  
16 trial motion work due last week, oppositions this week, and replies next week.

17 Preparation and participation in activities for the *Seneca Falls matter* currently consumes  
18 the time of Plaintiff's counsel such that Plaintiff through its counsel requests the two week  
19 extension for submission of the joint pre-trial order.

20 Cannon Management agrees with the request by Plaintiff, which is reasonable under the  
21 circumstances and also agrees the amount of additional time requested is reasonable to  
22 accommodate counsel for Plaintiff, but also to allow Cannon Management sufficient time to meet  
23 and confer with Plaintiff's counsel regarding the witnesses and documents, and any objections  
24 thereto.

25 DATED this 27<sup>th</sup> day of August, 2015.

26 BREMER WHYTE BROWN & O'MEARA

LAW OFFICES OF TERRY L. WIKE

27 By: 

By: /s/ Terry L. Wike, Esq.

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Attorneys for Plaintiffs

KOELLER, NEBEKER, CARLSON &  
HALUCK, LLP

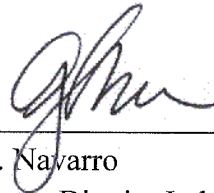
By:           /s/ Andrew Green, Esq.          

Andrew Green, Esq.  
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300 S. Fourth Street, Suite 500  
Las Vegas, NV 89101  
Attorney for Defendant  
DFT, Inc. d/b/a The Cannon Management Company

**ORDER**

**IT IS SO ORDERED** that the deadline for submission of the proposed joint pre-trial order for the above-referenced matter is extended to September 11, 2015.

**DATED:** August 27, 2015



\_\_\_\_\_  
Gloria M. Navarro  
United States District Judge