

1 Dean T. Kirby, Jr. 090114
 Roberta S. Robinson 099035
 2 KIRBY & McGUINN, A P.C.
 707 Broadway, Suite 1750
 3 San Diego, California 92101
 Telephone: (619) 685-4000
 4 Facsimile: (619) 685-4004

5 Cindy Lee Stock
 LAW OFFICES OF CINDY LEE STOCK, P.C.
 6 608 South 8th Street
 Las Vegas, NV 89101
 7 Telephone: (702) 382-1399
 Facsimile: (702) 382-0925

8
 9 Attorneys for Third Party Defendants and
 Counterclaimants and Fourth Party Plaintiffs
 DACA-Castaic, LLC and Debt Acquisition
 10 Company of America V, LLC

11 UNITED STATES DISTRICT COURT
 12 DISTRICT OF NEVADA

14 THE RICHARD AND SHEILA J.
 McKNIGHT 2000 FAMILY TRUST,
 15 Richard McKnight, Trustee

16 Plaintiff

17 v.

18 WILLIAM J. BARKETT, an individual,
 CASTAIC III PARTNERS, LLC
 19 a California limited liability company

20 Defendants

Case No. 2:10-cv-01617-RCJ

STIPULATION FOR EXTENSION OF
 TIME TO FILE AMENDED
 OPPOSITION TO APPLICATION FOR
 APPROVAL OF SETTLEMENT
 PROPOSAL

AND ORDER THEREON

DATE: April 15, 2016

TIME: 10:00 a.m.

COURTROOM: Las Vegas 4B
 Hon. Robert C. Jones

23 AND RELATED INTERVENOR
 ACTIONS, THIRD PARTY ACTIONS
 24 AND COUNTERCLAIMS

1 This Stipulation by and between Debt Acquisition Company of America V, LLC and DACA-
2 Castaic, LLC (collectively, "DACA"), and William J. Barkett, Castaic Partners, LLC, Castaic
3 Partners II, LLC and Castaic Partners III, LLC (collectively, the "Barkett Parties") and those Direct
4 Lenders represented by Lisa A. Rasmussen as their attorney of record (the "Rasmussen Direct
5 Lenders"), through their undersigned attorneys, is made with reference to the following facts:

6 1. On January 29, 2016, the Barkett Parties filed their Application for Approval of
7 Settlement Proposal and Request for Hearing (ECF No. 413). By minute order entered February 2.
8 2016 (ECF No.418) the Court set the Application w for hearing on February 12, 2016, a date which
9 preceded the time when opposition would normally have been due under the District Local Rules.

10 2. DACA and the Rasmussen Direct Lenders each filed responses to the motion shortly
11 prior to the scheduled hearing. At the hearing, counsel for DACA requested Court permission to file
12 an amended response to the Application which would also address the matters raised by the
13 Rasmussen Direct Lenders' response.

14 3. By minute order entered after the hearing, the Court set the matter for a continued
15 hearing on April 15, 2016, and set March 15, 2016 as the last day for filing DACA's amended
16 response to the Application.

17 4. Counsel for DACA represents to other counsel and to the Court that the March 15
18 deadline (which falls on a Tuesday) is extremely inconvenient as it is the day after counsel for
19 DACA will return from a scheduled vacation, and that reservations for that vacation trip were made
20 in January. Counsel of DACA has requested, and other counsel have agreed, that as a matter of
21 professional courtesy the response deadline should be continued for three days, from Tuesday,
22 March 15 to Friday, March 18.

23 ///

24

1 WHEREFORE the parties, through their undersigned counsel, stipulate to the entry of an
2 order providing as follows:

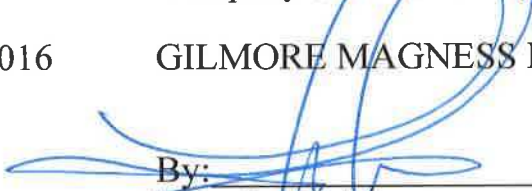
3 1. DACA may file an amended response to the Barkett Parties' Application for
4 Approval of Settlement Proposal (ECF No. 413) on or before Friday, March 18, 2016.

5 SO STIPULATED

6 DATE: February 25, 2016 KIRBY & McGUINN, A P.C.

7
8 By: /s/ Dean T. Kirby, Jr.
9 Dean T. Kirby, Jr.
10 Attorneys for Third Party Defendants and
11 Counterclaimants and Fourth Party Plaintiffs
12 DACA-Castaic, LLC and Debt Acquisition
13 Company of America V, LLC

11 DATE: February 25, 2016 GILMORE MAGNESS LEIFER

12
13 By: 
14 Timothy V. Logoluso
15 Attorneys for Defendants William J. Barkett,
16 Castaic Partners, LLC, Castaic Partners II,
17 LLC and Castaic Partners III, LLC

15 DATE: February 25, 2016 LAW OFFICE OF LISA A. RASMUSSEN

17 By: /s/ Lisa A. Rasmussen
18 Lisa A. Rasmussen
19 Counsel for Rasmussen Direct Lenders
20 and Castaic Investors, LLC

20 Upon the above Stipulation,

21 IT IS SO ORDERED.

22 DATE: March 1, 2016.

23
24 
UNITED STATES DISTRICT JUDGE

1 Dean T. Kirby, Jr. (Calif. Bar No. 090114)
Roberta S. Robinson (Calif. Bar No. 099035)
2 KIRBY & McGUINN, A P.C.
707 Broadway, Suite 1750
3 San Diego, California 92101
Telephone: (619) 685-4000
4 Facsimile: (619) 685-4004

5 Cindy Lee Stock
LAW OFFICES OF CINDY LEE STOCK, P.C.
6 608 South 8th Street
Las Vegas, NV 89101
7 Telephone: (702) 382-1399
Facsimile: (702) 382-0925

8
9 Attorneys for Third Party Defendants and
Counterclaimants / Third Party Plaintiffs
10 DACA-Castaic, LLC and Debt Acquisition
Company of America V, LLC

11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14
15 THE RICHARD AND SHEILA J.
McKNIGHT 2000 FAMILY TRUST,
16 Richard McKnight, Trustee

17 Plaintiff

18 v.

19 WILLIAM J. BARKETT, an individual,
CASTAIC III PARTNERS, LLC
20 a California limited liability company

21 Defendants

22 AND RELATED INTERVENOR
ACTIONS, THIRD PARTY ACTIONS
23 AND COUNTERCLAIMS

Case No. 2:10-CV-01617-RCJ

CERTIFICATE OF SERVICE

1 I, Jacquelyn Wilson, declare under penalty of perjury that the following facts
2 are true and correct: I am a resident of the State of California and over the age of 18
3 years and not a party to or interested in the above-entitled matter. I am an employee
4 of Kirby & McGuinn, A P.C., and my business address is 707 Broadway, Suite 1750,
5 San Diego, California 92101. On February 9, 2016, I served the following
6 document(s):

- 7 • STIPULATION FOR EXTENSION OF TIME TO FILE AMENDED
8 OPPOSITION TO APPLICATION FOR APPROVAL OF
9 SETTLEMENT PROPOSAL

by:

- 10 MAIL: by placing a true copy(ies) thereof in a sealed envelope(s) in the
11 outgoing mail tray located in my office for deposit in the United States
12 mail, with postage fully prepaid, addressed as shown below. I am readily
13 familiar with the business practice at my place of business for collection
14 and processing of outgoing mail with the U.S. Postal Service that same
15 day in the ordinary course of business.
- 16 PERSONAL SERVICE: by personally serving by hand delivery in an
17 envelope(s) addressed as shown below:
- 18 OVERNIGHT DELIVERY: by enclosing, a true copy (ies) in a sealed
19 FedEx envelope(s) addressed as shown below.
- 20 VIA FACSIMILE: by transmitting via facsimile to the number(s) shown
21 below:
- 22 VIA ECF FILING: by electronically mailing to the parties that are
23 registered or otherwise entitled to receive electronic notices in this case
24 pursuant to the Electronic Filing Procedures in this District.

- **Lynn L. Fetterly**
L.fetterly@yahoo.com
- **Lynn L. Fetterly**
L.fetterly@yahoo.com
- **David M. Gilmore**
dgilmore@gwvm.com,dgilmore@gwvm.com
- **Howard N. Gould**
hgould@frlawcorp.com,hgould@frlawcorp.com
- **Richard McKnight**
rmcknight@lawlasvegas.com,gkopang@lawlasvegas.com,msmith@lawlasvegas.com,
dmincin@lawlasvegas.com,cburke@lawlasvegas.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

- **David Mincin**
dmincin@lawlasvegas.com,gkopang@lawlasvegas.com,rmcknight@lawlasvegas.com,cburke@lawlasvegas.com
- **Jennifer J. Panicker**
jpanicker@gwvm.com,jpanicker@gwvm.com
- **Lisa A Rasmussen**
lisa@lrasnussenlaw.com,Stuart@lrasnussenlaw.com,Secretary@lrasnussenlaw.com,Alex@lrasnussenlaw.com
- **Richard Segerblom**
rsegerblom@lvcoxmail.com,tsegerblom@gmail.com

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: February 25, 2016 KIRBY & McGUINN, A P.C.

By: /s/ Jacquelyn Wilson
 Jacquelyn Wilson