JOSEPH P. GARIN (Bar No. 6653) KALEB D. ANDERSON (Bar No. 4782) LIPSON, NEILSON, COLE, SELTZER'& GARIN, P.C. 9080 W. Post Road, Suite 100 3 Las Vegas, Nevada 89148 (702) 382-1500 igarin@lipsonneilson.com 4 kanderson@lipsonneilson.com 5 Attorneys for Defendant Homeowner Association Services, Inc. 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 BAC HOME LOANS SERVICING, LP, 10 Plaintiff, 11 ٧. 12 STONEFIELD II HOMEOWNERS 13 ASSOCIATION; ANTHEM HIGHLANDS COMMUNITY ASSOCIATION: 14 MONTECITO AT MOUNTAIN'S EDGE HOMEOWNERS ASSOCIATION; 15 HERITAGE SQUARE SOUTH HOMEOWNERS' ASSOCIATION, INC.; 16 SIERRA RANCH HOMEOWNERS ASSOCIATION; CORTEZ HEIGHTS 17 HOMEOWNERS ASSOCIATION: SOUTHERN HIGHLANDS COMMUNITY 18 ASSOCIATION; ELKHORN - CIMARRON ESTATES HOMEOWNERS ASSOCIATION; 19 ELKHORN COMMUNITY ASSOCIATION, a Nevada non-profit corporation; CANYON 20 CREST ASSOCIATION; LAS BRISAS HOMEOWNERS ASSOCIATION: ALIANTE 21 MASTER ASSOCIATION: MOUNTAIN'S **EDGE MASTER ASSOCIATION; ALESSI &** 22 KOENIG, LLC; ALLIED TRUSTÉE SERVICES, INC.; ANGUIS & TERRY 23 COLLECTIONS, LLC; ASSESSMENT MANAGEMENT GROUP INC.; LJS&G, 24 LTD., d/b/a Leach Johnson Song & Gruchow' HOMEOWNER ASSOCIATION 25 SERVICES, INC.; NEVADA ASSOCIATION SERVICES, INC.; PHIL FRINK & 26 ASSOCIATES, INC.; G.J.L., INCORPORATED, d/b/a Pro Forma Lien & 27 Foreclosure; K.G.D.O. HOLDING COMPANY, INC., d/b/a Terry West Property 28 Management; RMI MANAGEMENT LLC d/b/a Red Rock Financial Services; SILVER STATE TRUSTEE SERVICES, LLC

CASE NO.: 2:11-cv-00167-JCM-RJJ

STIPULATION, REQUEST AND ORDER SETTING ASIDE DEFAULT AND EXTENDING TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

(First Request)

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8945 West Russell Road, Suite 330, Las Vegas, Nevada 89148 Telephone: (702) 538-9074 - Facsimile (702) 538-9113

Defendants.

Defendant Homeowner Association Services, Inc. ("Defendant"), by and through their undersigned counsel, and Plaintiff BAC Home Loan Servicing, LP by and through its counsel, hereby respectfully submit this Stipulation, Request and Order Setting Aside Default and Extending Time to Answer or Otherwise Respond to Plaintiff's Complaint (the "Stipulation"). This Stipulation is made in accordance with LR 6-1, LR 6-2, and LR 7-1 of the Local Rules of this Court. This is Defendant's First Request for an Extension of Time to File an Answer or Otherwise Respond to Plaintiff's Complaint. Defendant was served with a copy of the Summons and Complaint in this matter on February 2, 2011 and a Default was entered on February 25, 2011.

Upon agreement by and between all the parties hereto as set forth herein, the undersigned respectfully request this Court set aside the Default entered against Defendant and grant an extension of time, up to and including March 23, 2011 for Defendant to file an answer or otherwise respond to Plaintiff's Complaint. In addition, the parties respectfully request this Court to set a deadline of April 22, 2011 for Plaintiff to respond to any motions filed by Defendant.

By entering into this Stipulation, none of the parties waive any rights they have under statute, law, or rule with respect to Plaintiff's Complaint.

Stipulated and Agreed to:

AKERMAN SENTERFITT, LLP

/s/ Diana S. Erb Ariel E. Stern, Esq. Nevada Bar No. 8276 Diana S. Erb, Esq. Nevada Bar No. 10580 400 South Fourth Street, Suite 450 Las Vegas, Nevada 89101 Phone: (702)634-5000 Attorneys for BAC Home Loans, DATED: March 14, 2011.

LIPSON NEILSON COLE SELTZER & GARIN, P.C.

/s/ Kaleb Anderson Kaleb Anderson, Esq. Nevada Bar No. 007582 9080 W. Post Rd. #100 Las Vegas, Nevada 89148 Phone: (702)382-1500 Attorneys for Homeowner Association Servicés, Inc. DATED: March 14, 2011.

Lipson, Neilson, Cole, Seltzer & Garin, P.C. 9080 West Post Road, Suite 100 Las Vegas, NV 89148 (702) 382-1500

<u>ORDER</u>

GOOD CAUSE APPEARING:

IT IS ORDERED that the Default entered against Defendant Homeowner Association Services, Inc. be set aside.

IT IS FURTHER ORDERED that Defendant's request for an extension of time to answer or otherwise respond to Plaintiff's Complaint is granted, and said answer or response is due on or before March 23, 2011, with Plaintiff's Response to Motions due on or before April 22, 2011.

DATED this 8th day of April, 2011.

UNITED STATES DISTRICT JUDGE