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5 Attorneys for Plaintiff/Counter-defendant

6 **IN THE UNITED STATES DISTRICT COURT**  
 7 **FOR THE DISTRICT OF NEVADA**

8 KAL-MOR-USA, LLC,	)	Case No. 2:13-cv-01046-GMN-PAL
	)	
9 Plaintiff,	)	<b>SECOND STIPULATION TO EXTEND</b>
	)	<b>PLAINTIFF'S OPPOSITION DUE DATE</b>
10 vs.	)	<b>TO INTERVENOR DEFENDANT</b>
	)	<b>RESIDENTIAL CREDIT SOLUTIONS,</b>
11 BANK OF AMERICA, N.A., a National	)	<b>INC.'S MOTION FOR SUMMARY</b>
12 Association; FIDELITY NATIONAL TITLE	)	<b>JUDGMENT</b>
13 INSURANCE COMPANY, a foreign	)	
14 corporation; DOES I through X; and ROE	)	
15 CORPORATIONS I through X, inclusive,	)	
	)	
16 Defendants.	)	
	)	
17 RESIDENTIAL CREDIT SOLUTIONS,	)	
18 INC.	)	
	)	
19 Intervening Defendant.	)	

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20 **STIPULATION**

21 This Stipulation ((Second Request) is entered into and agreed upon by Kal-Mor-USA, LLC  
 22 ("Plaintiff"), by and through its counsel of record Raffi A. Nahabedian, of the Law Office of Raffi  
 23 A. Nahabedian, as well as by Residential Credit Solutions, Inc. ("Defendant"), by and through its  
 24 counsel of record Christina V. Miller, of the Law Firm Wright Finlay & Zak, LLP. The Stipulation  
 25 is entered into as a means to allow Plaintiff additional time to file and serve its Opposition to  
 26 Defendant's Motion for Summary Judgment. (ECF 88). The Court approved the First Stipulation  
 27 (ECF 90) for an Opposition due date of December 22, 2017 and a Reply Date of January 8, 2018.

1 This Stipulation (Second Request) for an additional thirty (30) day extension of time is  
2 agreed upon and entered into in good faith by the parties based on the parties continued good faith  
3 attempts to diligently resolve and settle the pending lawsuit. The proposed new due date for the  
4 Opposition is January 22, 2018, with a new Reply due date of February 8, 2018.

5 This additional time will allow the parties to complete their good faith negotiations, will  
6 prevent increased litigation costs and, indeed, will reduce the burden on this Court by not having to  
7 entertain or hear matters that may and can be resolved and settled in the near/immediate future.

8 **IT IS SO JOINTLY STIPULATED:**

9 DATED this 19<sup>st</sup> day of December 2017. DATED this 19<sup>st</sup> day of December 2017.

10 By: Raffi A. Nahabedian, Esq. By: Christina V. Miller, Esq.

11 Raffi A. Nahabedian, Esq. (SBN 09347)  
12 10655 Park Run Drive, Suite 210-B  
13 Las Vegas, NV 89144  
14 Attorney for Plaintiff  
15 KAL-MOR-USA, LLC

Dana Jonathon Nitz, Esq. (SBN 00050)  
Christina V. Miller, Esq. (SBN 12448)  
WRIGHT, FINLAY & ZAK, LLP  
7785 W. Sahara Avenue, Suite 200  
Las Vegas, NV 89117  
Attorneys for Intervenor,  
RESIDENTIAL CREDIT SOLUTIONS, INC.

16 **ORDER**

17 IT IS HEREBY ORDERED that the parties' Stipulation is GRANTED in part, and DENIED in  
18 part. For good cause appearing, the parties shall have an extension of fourteen (14) days from the  
19 issuance of this Order.

20 **IT IS SO ORDERED.**

21 Dated this 27 day of December, 2017.

  
\_\_\_\_\_  
Gloria M. Navarro, Chief Judge  
UNITED STATES DISTRICT COURT

23 Respectfully Submitted By:

24 LAW OFFICE OF RAFFI A. NAHABEDIAN

25 By: Raffi A. Nahabedian, Esq.

26 Raffi A. Nahabedian, Esq.  
27 Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 19<sup>st</sup> day of December, 2017, service of the foregoing Stipulation (Second Request) was made this date by electronically serving, through the Court's/Court Clerk's CM/ECF e-file system, a true and correct copy of the same, to the following parties:

Jacob S. Smith, Esq.  
Shawn L. Walkenshaw, Esq.  
HOUSER & ALLISON  
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**Attorneys for Intervenor,  
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/s/ Raffi A. Nahabedian, Esq.  
An employee of Raffi A. Nahabedian

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