1 2 3 4 5 6 7 8 9	Abran E. Vigil Nevada Bar No. 7548 Sylvia O. Semper Nevada Bar No. 12863 Matthew D. Lamb Nevada Bar No. 12991 BALLARD SPAHR LLP 100 North City Parkway, Suite 1750 Las Vegas, Nevada 89106 Telephone: (702) 471-7000 Facsimile: (702) 471-7070 vigila@ballardspahr.com sempers@ballardspahr.com lambm@ballardspahr.com Attorneys for JPMorgan Chase Bank, N.A And Federal National Mortgage Association	on	
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11			
12	LN MANAGEMENT, LLC SERIES 5664 DIVOT,	Case No. 2:13-cv-01420-RCJ-GWF	
13	Plaintiff,		
14	vs.	STIPULATION AND ORDER FOR EXTENSION OF TIME TO SUBMIT	
15 16	KIT DANSKER and JPMORGAN CHASE BANK, N.A.,	JOINT DISCOVERY PLAN (First Request)	
10	Defendants,		
18	And		
19	FEDERAL NATIONAL MORTGAGE ASSOCIATION and FEDERAL HOUSING FINANCE AGENCY,		
20	Intervenors.		
21			
22	JPMORGAN CHASE BANK, N.A., FEDERAL NATIONAL MORTGAGE		
23	ASSOCIATION and FEDERAL HOUSING FINANCE AGENCY,		
24	Counter-claimant,		
25			
26	vs. LN MANAGEMENT, LLC SERIES 5664		
27	DIVOT, LOS PRADOS COMMUNITY ASSOCIATION, INC.		
28	Counter-Defendant.		
	DMWEST #12046420 v1		

Plaintiff/Counter-defendant LN Management, LLC Series 5664 Divot, and
Defendant/Counter-plaintiff JPMorgan Chase Bank, N.A. and Intervenors/Counterplaintiffs Federal National Mortgage Association and Federal Housing Finance
Agency (collectively "the parties") by and through their counsel of record, hereby
stipulate and agree as follows:

1. The parties request a 30-day enlargement of time to file their joint discovery plan and scheduling order to Wednesday, July 15, 2015 for the following reasons:

9	a. On May 1, 2015, the parties filed a Stipulation to Entry of Order and		
10	Proposed Order Permitting Federal National Mortgage Association		
11	and Federal Housing Finance Agency to Intervene [Dkt No. 33], which		
12		this Court granted on May 14, 2015 [Dkt No. 35].	
13	b.	On June 12, 2015, Intervenors Federal National Mortgage Association	
14	4 and Federal Housing Finance Agency to Intervene filed their Answers		
15	5 to Complaint and Counterclaims against Plaintiff and Los Prados		
16		Community Association, Inc. [Dkt Nos. 36 and 37].	
17	c.	Counter-plaintiffs are in the process of serving counter-defendant Los	
18		Prados Community Association, Inc. with a copy of their	
19		counterclaims.	
20	d.	At this time, Los Prados Community Association, Inc. has not yet	
21		appeared in this matter.	
22	2.	Because an additional party is about to enter this case, the current	
23	parties believe it makes sense to enlarge time to submit a discovery plan and		
24	scheduling order.		
25	3.	This request is being made to allow time for all current and	
26	prospective parties to participate in the Fed. R. Civ. P. 26(f) conference and not for		
27	the purpose of delay.		

1	IT IS SO STIPULATED this 15 th day of June, 2015.		
2		BALLARD SPAHR LLP	
3 4 5 6 7	By: <u>/s/Kerry Faughnan</u> Kerry P. Faughnan PO Box 335361 North Las Vegas, NV 89033 Kerry.faughnan@gmail.com <i>Attorney for Plaintiff</i>	By: <u>/s/ Abran Vigil</u> Abran E. Vigil (SBN 7548) Sylvia O. Semper (SBN 12863) 100 N. City Parkway, Suite 1750 Las Vegas, Nevada 89106 Attorneys for Defendants JPMorgan Chase Bank, N.A. and Federal National Mortgage Association	
8	FENNEMORE CRAIG		
9 10	By: <u>/s/Leslie Bryan Hart</u>		
11	Leslie Bryan Hart, Esq. (SBN4932) John D. Tennert, Esq. (SBN 11728) 300 S. Second St., Suite 1510		
12 13	Reno, Nevada 89501 <i>Attorneys for Intervenor Federal</i> <i>Housing Financing Agency</i>		
14	IT IS SO ORDERED:		
15	M	40	
16	GEORGE FOLEY, R		
17	United States Magistrate Judge		
18	Dated: June 17, 2015		
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	DMWEST #12046420 v1	3	