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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11  
12 LN MANAGEMENT LLC SERIES 7241  
BROOK CREST,

13  
14 Plaintiff,

15 vs.

16 BRANDON JHUN, et al.,

17 Defendants.

Case No. 2:14-cv-01936-APG-GWF

**WELLS FARGO'S REQUEST FOR  
LEAVE TO HAVE CLIENT  
REPRESENTATIVE PARTICIPATE BY  
PHONE IN SETTLEMENT  
CONFERENCE**

18 Pursuant to the Court's Order Scheduling a Settlement Conference (Doc. 36), Wells Fargo  
19 hereby respectfully requests a limited exception to the Court's attendance requirements for the  
20 settlement conference scheduled to commence at 9:00 a.m. on Thursday, April 7, 2016.  
21 Specifically, to accommodate the fact that Wells Fargo's representative with authority to settle  
22 this case is not located in or near the State of Nevada, Wells Fargo requests permission to allow  
23 its representative to participate in the conference by phone as necessary. The grounds for this  
24 request are set forth further below.

25 First, Wells Fargo takes this process and the Court's procedures very seriously, and  
26 intends to participate in this conference in good faith. In addition, Wells Fargo's outside counsel  
27 will attend the settlement conference in person. However, as a logistical matter, Wells Fargo's  
28 corporate representative responsible for this case is located in Charlotte, North Carolina. That

1 individual is also charged not only with responsibility for this case, but for many other properties  
2 facing similar and other litigation throughout Nevada and elsewhere. As a result, attendance in  
3 person at the conference would require the commitment of part or all of three days.

4 Second, Wells Fargo contacted counsel for all parties, each of whom indicated they have  
5 no objection to Wells Fargo's corporate representative appearing at the settlement conference  
6 telephonically.

7 Third, as counsel for Wells Fargo communicated to the Court during the telephonic  
8 conference on January 20, 2016, Wells Fargo anticipates that this case, like most other similar  
9 cases, will be determined based on the Court's determination of legal issues relating to the HOA's  
10 purported foreclosure sale. In the absence of a settlement in this case, Wells Fargo will be filing a  
11 dispositive motion on these issues. But Wells Fargo agrees with the other parties that the  
12 potential resolution of the United States' interest in the property by settlement with LN  
13 Management would help to advance this case and clarify the remaining issues.

14 Accordingly, Wells Fargo respectfully requests that it be allowed leave to participate in  
15 good faith in the conference telephonically, without requiring in-person attendance.

16 Respectfully submitted this 23rd day of March, 2016.

17 SNELL & WILMER L.L.P.

18  
19 /s/ Tanya N. Peters  
20 \_\_\_\_\_  
21 AMY F. SORENSON  
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**ORDER**

Wells Fargo's Request for Leave to Have Client Representative Participate by Phone in the Settlement Conference is granted. IT IS SO ORDERED this 24th day of March, 2016.

  
\_\_\_\_\_  
GEORGE FOLEY JR.  
United States Magistrate Judge

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**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **DEFENDANT WELLS FARGO’S REQUEST FOR LEAVE TO HAVE CLIENT REPRESENTATIVE PARTICIPATE BY PHONE IN SETTLEMENT CONFERENCE** by the method indicated:

- \_\_\_\_\_ U.S. Mail
- \_\_\_\_\_ U.S. Certified Mail
- \_\_\_\_\_ Facsimile Transmission
- \_\_\_\_\_ Overnight Mail
- \_\_\_\_\_ Federal Express
- \_\_\_\_\_ Hand Delivery
- X   Electronic service

and addressed to the following:

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*Attorney for Plaintiff*

*Attorneys for Department of Treasury-Internal Revenue Service*

DATED this 23<sup>rd</sup> day of March, 2016.

/s/ Nissa Riley  
An Employee of Snell & Wilmer L.L.P.