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*Attorneys for Defendant, OSCAR MORENO*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

1597 ASHFIELD VALLEY TRUST, a Nevada Trust; ) CASE NO. 2:14-cv-2123-JCM-GWF  
DAVID TOTH and SIRWAN TOTH, Trustees, )

Plaintiffs, )

vs. )

FEDERAL NATIONAL MORTGAGE )  
ASSOCIATION SYSTEM, a Delaware Association; )  
VENTA FINANCIAL GROUP, INC., a Nevada )  
Corporation; OSCAR MORENO, an Individual; )  
DOES, 1 through 25 inclusive; and ROE )  
CORPORATIONS, I through X, inclusive, )

Defendants. )

**AMENDED STIPULATION AND  
ORDER TO EXTEND TIME TO  
FILE RESPONSE TO  
FHFA/FNMA'S MOTION FOR  
SUMMARY JUDGMENT (ECF  
NO. 126]**

**(First Request)**

FEDERAL NATIONAL MORTGAGE )  
ASSOCIATION SYSTEM, )

Counterclaimant, )

vs. )

1597 ASHFIELD VALLEY TRUST, a Nevada Trust; )  
DAVID TOTH and SIRWAN TOTH, Trustees; )  
HIDDENCREST/PARKHURST COMMUNITY )  
ASSOCIATION, a Nevada non-Profit Corporation; )  
and ABSOLUTE COLLECTION SERVICES, LLC, a )  
Nevada Limited-Liability Company, )

Counterdefendants. )

1 **STIPULATION TO EXTEND**

2 **(First Request)**

3 Pursuant to Local Rules 6-1, the parties, by and through their attorneys of record, submit  
4 the following stipulation for the Court's review and approval.

5 1. On August 2, 2016, this Court issued an order denying the FHFA/FNMA's  
6 motion for summary judgment without prejudice and directed the FHFA/FNMA to re-file its  
7 motion after notifying the Attorney General of Nevada that this action involves a constitutional  
8 challenge to Nevada statute. See ECF No. 119.

9 2. On October 18, 2016, FHFA/FNMA to re-filed its motion for summary judgment.  
10 ECF No. 126.

11 3. On November 14, 2016, Moreno re-newed his response to FHFA/FNMA's  
12 motion for summary judgment. ECF No. 130.

13 4. The parties understand that the inadvertently delayed November 14, 2016 filing  
14 resulted from the fact that lead counsel for Moreno is serving in a month-long trial for the entire  
15 month of November in Reno, Nevada and failure of synchronization of internal calendars  
16 between lead counsel and other staff monitoring the case.

17 5. The parties agree that this Court should grant Moreno leave to re-new his  
18 response and countermotion for summary judgment (ECF No. 132) because the parties desire to  
19 have all remaining claims and issues resolved by motion so necessary appeals may proceed.  
20 Moreno may have up to an including November 15, 2016 to file and renew his response to the  
21 motion for summary judgment

22 DATED: November 28th, 2016.

DATED: November 28th, 2016.

23 **BLACK & LOBELLO**

**ALDRIDGE PITE, LLP**

24  
25 /s/ Maximiliano D. Couvillier, III, Esq.  
26 Maximiliano D. Couvillier, III, Esq.  
27 (SBN 7661)  
10777 West Twain Avenue, Suite 300  
28 Las Vegas, Nevada 89135  
*Attorneys for Oscar Moreno*

/s/ Jory C. Garabedian  
Laurel I. Handley, Esq. (SBN 9576)  
Jory C. Garabedian, Esq. (SBN 10352)  
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*Attorneys for Federal National Mortgage  
Association and Federal Housing Finance  
Agency*

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DATED: November 28th, 2016.

**FENNEMORE CRAIG JONES VARGAS**

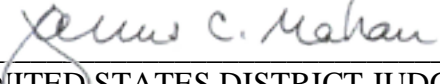
/s/ Leslie Bryan Hart, Esq.  
Leslie Bryan Hart, Esq.  
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Michael A.F. Johnson, Esq.  
Asim Varma, Esq.  
Arnold & Porter LLP  
601 Massachusetts Avenue, NW  
Washington, DC 20001

Attorneys for Defendant FEDERAL  
HOUSING FINANCE AGENCY

**ORDER**

IT IS SO ORDERED that Oscar Moreno’s response to FHFA/FNMA’s Motion for  
Summary Judgment (ECF No. 130) shall be due on November 15, 2016.

  
UNITED STATES DISTRICT JUDGE

DATED: November 29, 2016  
NUNC PRO TUNC 11/15/2016

Respectfully submitted:

**BLACK & LOBELLO**

/s/ Maximiliano D. Couvillier, III, Esq.  
Maximiliano D. Couvillier, III, Esq.  
(SBN 7661)  
10777 West Twain Avenue, Suite 300  
Las Vegas, Nevada 89135  
*Attorneys for Oscar Moreno*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 28th day of November, 2016, I served a copy of the foregoing  
3 **STIPULATION AND AMENDED ORDER TO EXTEND TIME TO FILE RESPONSE**  
4 **TO FHFA/FNMA’S MOTION FOR SUMMARY JUDGMENT (ECF NO. 126] (First**  
5 **Request)** through the Clerk’s Office using CM/ECF System for filing and transmittal of a Notice  
6 of Electronic Filing to the CM/ECF registrants.  
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8  
9 */s/ Shirley Blackburn*  
10 \_\_\_\_\_  
An employee of Black & LoBello

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