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7 Community Association, Inc.

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 LN MANAGEMENT LLC SERIES 2543 CITRUS) CASE NO. 2:15-cv-00112-MMD-CWH
GARDEN,)

11 Plaintiff,)

12 vs.)

13 MARCELLE GELGOTAS, an individual;)
MICHELLE ROCK, an individual; MARK ROCK,)
14 an individual; FEDERAL NATIONAL)
MORTGAGE ASSOCIATION; CITRUS)
15 GARDENS HOMEOWNERS ASSOCIATION, a)
Nevada Non-Profit Corporation; DOES 1 through)
16 10, inclusive,)

17 Defendants.)

18 and)

19 FEDERAL HOUSING FINANCE AGENCY,)
as Conservator for the Federal National Mortgage)
20 Association,)

21 Intervenor.)

22 FEDERAL NATIONAL MORTGAGE)
ASSOCIATION,)

23 Counterclaimant,)

24 and)

25 FEDERAL HOUSING FINANCE AGENCY,)
as Conservator for the Federal National Mortgage)
26 Association,)

27 Intervenor.)

28 vs.)

LN MANAGEMENT LLC SERIES 2543 CITRUS)
29 GARDEN, a Nevada LLC; GREEN VALLEY)
RANCH COMMUNITY ASSOCIATION, INC., a)
30 Nevada non-profit corporation; DOES 1 through 10,)

**STIPULATION AND ORDER TO
EXTEND TIME
(First Request)**

1 inclusive; ROES Business Entities 1 through 10,)
2 inclusive,)
3 Counterdefendants.)

4 **STIPULATION AND ORDER TO EXTEND TIME**
5 **(First Request)**

6 Pursuant to Local Rules 6-1 and 7-1, the parties, by and through their respective attorneys
7 of record, stipulate as follows:

8 **STIPULATION**

9 IT IS HEREBY STIPULATED that FEDERAL HOUSING FINANCE AGENCY
10 (“Federal Housing”) filed a counterclaim against Green Valley Ranch Community Association,
11 Inc. (“Green Valley”) on March 12, 2015 [Doc. 27].

12 IT IS FURTHER STIPULATED that Federal National Mortgage Association’s (“Fannie
13 Mae”) and Federal Housing’s Joint Motion for Summary Judgment was filed on March 20, 2015
14 [Doc. 32].

15 IT IS FURTHER STIPULATED that oppositions to Fannie Mae’s and Federal Housing’s
16 Joint Motion for Summary Judgment [Doc. 32] were due on or before April 13, 2015.

17 IT IS FURTHER STIPULATED that Green Valley’s current counsel substituted into this
18 matter on March 16, 2015 and that shortly thereafter lead counsel was appointed as a state
19 district court judge.

20 IT IS FURTHER STIPULATED that, as a result of this transition, Green Valley requires
21 additional time to prepare its response to Federal Housing’s counterclaim [Doc. 27] and its
22 opposition to Fannie Mae’s and Federal Housing’s Joint Motion for Summary Judgment [Doc.
23 32].

24 IT IS FURTHER STIPULATED that there is excusable negligence for Green Valley’s
25 failure to submit this stipulation by the current filing deadlines, because these developments
26 arose recently and but for these recent developments, Green Valley would have filed its response
27 and opposition by the current deadlines.

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1 THEREFORE, IT IS STIPULATED that Green Valley be granted an extension of time
2 up to and including **April 28, 2015**, in which to file a response to Federal Housing's
3 counterclaim [Doc. 27] and to file an opposition to Fannie Mae's and Federal Housing's Joint
4 Motion for Summary Judgment [Doc. 32].

5 DATED: April 22, 2015.
6 WOLFE & WYMAN LLP
7 /s/ Colt B. Dodrill
8 Colt B. Dodrill, Esq. (SBN 9000)
9 980 Kelly Johnson Drive, Suite 140
10 Las Vegas, Nevada 89119
11 *Attorneys for Federal National Mortgage*
12 *Association*

13 DATED: April 22, 2015.
14 FENNEMORE CRAIG
15 /s/ Leslie Bryan Hart
16 Leslie Bryan Hart, Esq. (SBN 4932)
17 John D. Tennert, Esq. (SBN 11728)
18 300 East Second Street, Suite 1510
19 Reno, Nevada 89501
20 *and*
21 Asim Varma, Esq. (*Pro Hac Vice*)
22 Michael A.F. Johnson, Esq. (*Pro Hac Vice*)
23 ARNOLD & PORTER
24 555 12th Street NW
25 Washington, DC 20004
26 *Attorneys for Federal Housing Finance*
27 *Agency*

 DATED: April 22, 2015.
 GORDON & REES LLP
 /s/ Ashlie Surur
 ROBERT S. LARSEN, ESQ. (SBN 7785)
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 Attorneys for Green Valley
 Ranch Community Association, Inc.

 DATED: April 22, 2015.
 KERRY P. FAUGHNAN, ESQ.
 /s/ Kerry Faughman
 Kerry Faughman, Esq. (SBN 12204)
 P.O.Box 335361
 North Las Vegas, NV 89086
 Attorneys for LN Management LLC
 Series 2543 Citrus Garden

ORDER

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: April 22, 2015