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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 INVEST VEGAS LLC; MDM
10 CONSULTANTS, INC.

Case No.: 2:15-cv-00644-VCF

11 Plaintiff,

12 v.

STIPULATION AND ORDER TO EXTEND
PRE-TRIAL ORDER DEADLINE

13 21ST MORTGAGE CORPORATION; CAL-
WESTERN RECONVEYANCE
14 CORPORATION; NATIONAL CITY
MORTGAGE, A DIVISION OF
15 NATIONAL CITY BANK OF INDIANA;
COMMONWEALTH LAND TITLE
16 INSURANCE COMPANY; ONTARIO
CONDOMINIUM RENTAL SERVICES,
17 INC; HARLEE S. CARTER; LANA
CARTER; DARREN C. BOUTON; DOES I
18 through X, inclusive; ROE BUSINESS
ENTITIES I through X inclusive.

(THIRD REQUEST)

19
20 Defendants.

21
22 Plaintiff MDM Consultants (“Plaintiff”) and Defendant 21st Mortgage Corporation
23 (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record,
24 hereby stipulate and agree that the deadline to submit the Joint Pretrial Order in this matter be
25 continued by 14 days to allow for the Parties to fully prepare and discuss the various aspects of
26 trial. The Parties diligently discussed settlement prospects and participated in mediation which
27 concluded without resolution in the afternoon of July 15, 2021. Because of the length of the
28 mediation, the Parties have not had a sufficient opportunity to fully and thoroughly review the

1 various aspects of the Joint Pretrial Order and discuss what evidence will be presented at the time
2 of trial. Accordingly, the Parties are requesting that the current deadline to submit the Joint Pretrial
3 Order, currently scheduled for July 19, 2021, be extended to August 2, 2021. This is the third
4 stipulation of the Parties to continue this deadline. The relevant timeline has not lapsed as of the
5 submission of this Stipulation, and this additional time will allow the parties to further confer about
6 exhibits and witnesses to be presented at trial, and to timely submit a Joint Pretrial Order. Further,
7 this Stipulation complies with the relevant provisions of LR IA 6-1(a) and LR 26-4. Therefore, the
8 Parties propose that the deadline for the Joint Pretrial Order be continued until August 2, 2021.

9
10 DATED this 19th day of July, 2021.

DATED this 19th day of July, 2021.

11
12 **SHUMWAY VAN**

HUTCHINSON & STEFFEN, PLLC

13 By: /s/ Garrett R. Chase
14 GARRETT R. CHASE, ESQ.
15 Nevada Bar No. 14498
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18 *Attorney for MDM Consultants, Inc.*

By: /s/ Michael R. Brooks
MICHAEL R. BROOKS, ESQ.
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Attorney for 21st Mortgage Corporation

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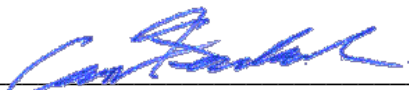
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ORDER

Upon Stipulation of the parties, and for good cause appearing therefore, IT IS HEREBY ORDERED as follows:

a. Deadline to for Joint Pretrial Order: August 2, 2021.

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

Respectfully Submitted by:

SHUMWAY VAN

BY: /s/ Garrett R. Chase
GARRETT R. CHASE, ESQ.
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Las Vegas, NV 89123
Attorney for MDM Consultants, Inc.

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From: [Michael R. Brooks](#)
To: [Garrett R. Chase](#)
Cc: [Marina Scott](#)
Subject: RE: 21st Mortgage adv. Invest Vegas
Date: Monday, July 19, 2021 2:29:50 PM

This looks fine.

From: Garrett R. Chase <Garrett@shumwayvan.com>
Sent: Monday, July 19, 2021 4:00 PM
To: Michael R. Brooks <mbrooks@hutchlegal.com>
Cc: Marina Scott <marinas@shumwayvan.com>
Subject: RE: 21st Mortgage adv. Invest Vegas

Mike,

Attached is the proposed stipulation for your review. If it looks good, let me know and we'll get it submitted.

Best,

Garrett R. Chase, Esq.

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To: Garrett R. Chase <Garrett@shumwayvan.com>
Cc: Marina Scott <marinas@shumwayvan.com>
Subject: RE: 21st Mortgage adv. Invest Vegas

Yes, Not sure what happened. Send it over.

From: Garrett R. Chase <Garrett@shumwayvan.com>
Sent: Monday, July 19, 2021 3:49 PM
To: Michael R. Brooks <mbrooks@hutchlegal.com>
Cc: Marina Scott <marinas@shumwayvan.com>
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