

SHUMWAY • VAN
 8985 South Eastern Avenue, Suite 100
 Las Vegas, Nevada 89123
 Telephone: (702) 478-7770 Facsimile: (702) 478-7779

GARRETT R. CHASE, ESQ.
 Nevada Bar No. 14498
SHUMWAY VAN
 8985 South Eastern Avenue, Suite 100
 Las Vegas, Nevada 89123
 Telephone: (702) 478-7770
 Facsimile: (702) 478-7779
 Email: garrett@shumwayvan.com
Attorney for MDM Consultants, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

INVEST VEGAS LLC; MDM
 CONSULTANTS, INC.

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

Plaintiff,

v.

**STIPULATION AND ORDER TO EXTEND
 PRE-TRIAL ORDER DEADLINE AND
 CONTINUE TRIAL**

(FIRST REQUEST)

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

Defendants.

Plaintiff MDM Consultants (“Plaintiff”) and Defendant 21st Mortgage Corporation (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate and agree that the pre-trial deadlines in this matter be continued by 60 days to allow the Court to resolve Defendant’s pending Motion for Reconsideration, and to allow the Parties to discuss potential resolution of this matter. Specifically, the Parties are requesting that the current deadline to submit the Joint Pretrial Order, currently scheduled for April 5, 2021, be extended 60 days or to after such time as this Court has resolved the pending Motion for

Reconsideration. Though not yet scheduled, the Parties also request that the trial in this matter be continued accordingly. This is the first stipulation of the Parties to continue these deadlines, and the time of trial in this matter. As the relevant timelines have not lapsed, and as this request will allow the parties to discuss settlement potential and allow the Court time to resolve Defendant's pending Motion for Reconsideration, good cause exists for this stipulated request. Further, this Stipulation complies with the relevant provisions of LR IA 6-1(a) and LR 26-4. Accordingly, the Parties propose that the deadline for the Joint Pretrial Order be continued until June 4, 2021, or 30 days after the Court announces its decision regarding Defendant's Motion for Reconsideration.

DATED this 30th day of March, 2021.

DATED this 30th day of March, 2021.

SHUMWAY VAN

HUTCHINSON & STEFFEN, PLLC

By: /s/ Garrett R. Chase
GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
8985 S. Eastern Ave., Suite 100
Las Vegas, NV 89123
Attorney for MDM Consultants, Inc.

By: /s/ Michael R. Brooks
MICHAEL R. BROOKS, ESQ.
Nevada Bar No. 7287
8985 S. Eastern Ave., Suite 100
Las Vegas, NV 89123
Attorney for 21st Mortgage Corporation

SHUMWAY • VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

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: June 4, 2021.

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

March 31, 2021

Respectfully Submitted by:

SHUMWAY VAN

BY: /s/ Garrett R. Chase
GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
8985 South Eastern Avenue, Suite 100
Las Vegas, NV 89123
Attorney for MDM Consultants, Inc.