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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 INVEST VEGAS LLC; MDM
13 CONSULTANTS, INC.

14 Plaintiff,

15 v.

16 21ST MORTGAGE CORPORATION; CAL-
17 WESTERN RECONVEYANCE
18 CORPORATION; NATIONAL CITY
19 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.

20 Defendants.

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

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

23 **(FIRST REQUEST)**

24 Plaintiff MDM Consultants (“Plaintiff”) and Defendant 21st Mortgage Corporation
25 (“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

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

9

10 DATED this 30th day of March, 2021.

11

12 **SHUMWAY VAN**

13 By: /s/ Garrett R. Chase
14 GARRETT R. CHASE, ESQ.
15 Nevada Bar No. 14498
16 8985 S. Eastern Ave., Suite 100
17 Las Vegas, NV 89123
18 *Attorney for MDM Consultants, Inc.*

19 DATED this 30th day of March, 2021.

20

21 **HUTCHINSON & STEFFEN, PLLC**

22 By: /s/ Michael R. Brooks
23 MICHAEL R. BROOKS, ESQ.
24 Nevada Bar No. 7287
25 8985 S. Eastern Ave., Suite 100
26 Las Vegas, NV 89123
27 *Attorney for 21st Mortgage Corporation*

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.

Conrad

Cam Ferenbach
United States Magistrate Judge

March 31, 2021

Respectfully Submitted by:

SHUMWAY VAN

BY: /s/ Garrett R. Chase

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