

1 **COLT B. DODRILL, ESQ.**  
 Nevada Bar No. 9000  
 2 **WOLFE & WYMAN LLP**  
 980 Kelly Johnson Drive, Ste. 140  
 3 Las Vegas, NV 89119  
 Tel: (702) 476-0100  
 4 Fax: (702) 476-0101  
 cbdodrill@wolfewyman.com

5 Attorneys for Plaintiff/Counterclaim Defendant  
 6 **GREEN TREE SERVICING LLC, NOW**  
**KNOWN AS DITECH FINANCIAL LLC**

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

10 GREEN TREE SERVICING LLC,  
 11 Plaintiff,

12 v.

13 VALENCIA MANAGEMENT LLC SERIES 4;  
 SILVERADO COURT LANDSCAPE  
 14 MAINTENANCE CORPORATION,

15 Defendants.

CASE NO.: 2:15-cv-00725-JCM-PAL

**STIPULATION FOR EXTENSION OF  
 TIME FOR PLAINTIFF TO FILE REPLY  
 IN SUPPORT OF MOTION FOR LEAVE  
 TO FILE SECOND AMENDED  
 COMPLAINT AND FIRST AMENDED  
 ANSWER TO FIRST AMENDED  
 COUNTERCLAIM**

16 VALENCIA MANAGEMENT LLC SERIES 4, a  
 17 Nevada Limited Liability Company,

18 Counterclaim Plaintiff,

19 v.

20 GREEN TREE SERVICING LLC; DOES I  
 through X, inclusive; ROES CORPORATION 1  
 21 through 10, inclusive,

22 Counterclaim Defendants.

(SECOND REQUEST)

23 VALENCIA MANAGEMENT LLC SERIES 4, a  
 24 Nevada Limited Liability Company,

25 Third Party Plaintiff,

26 v.

27 SUSANNA MIZRAHI, an individual; AQUA  
 FINANACE, INC., a foreign corporation; DOE  
 28 INDIVIDUALS I through X, inclusive; ROE



1 CORPORATIONS 1 through 10, inclusive,  
2 Third Party Defendants.

3  
4 WHEREFORE, on September 14, 2015, Green Tree Servicing LLC, now known as Ditech  
5 Financial LLC (“Green Tree”) filed its Motion for Leave to File Second Amended Complaint and  
6 First Amended Answer to Counterclaim;

7 WHEREFORE, on September 28, 2015, Defendant Silverado Court Landscape Maintenance  
8 Corporation filed its Opposition to Green Tree’s Motion for Leave to File Second Amended  
9 Complaint and First Amended Answer to Counterclaim;

10 WHEREFORE, Green Tree’s Reply in Support of its Motion for Leave to File Second  
11 Amended Complaint and First Amended Answer to Counterclaim is currently due on or before  
12 October 8, 2015;

13 WHEREFORE, the parties stipulate as follows:

14 IT IS HEREBY STIPULATED AND AGREED between Plaintiff/Counterclaim Defendant,  
15 Green Tree and Defendant, Silverado Court Landscape Maintenance Corporation, by and through  
16 their undersigned attorneys, that Green Tree shall have up to and including October 15, 2015 to file  
17 its Reply in Support of its Motion for Leave to File Second Amended Complaint and First Amended  
18 Answer to Counterclaim.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 This is Green Tree's second request for an extension to file Reply in Support of its Motion  
2 for Leave to File Second Amended Complaint and First Amended Answer to Counterclaim, and is  
3 not intended to cause any delay or prejudice to any party. Trial has not been set in this case yet.  
4

5 WOLFE & WYMAN LLP

LEACH JOHNSON SONG & GRUCHOW

7 By: /s/ Colt B. Dodrill

By: /s/ T. Chase Pittsenbarger

8 Colt B. Dodrill  
9 Nevada Bar No. 9000  
10 980 Kelly Johnson Drive, Suite 140  
11 Las Vegas, NV 89119

Sean L. Anderson  
Nevada Bar No. 7259  
T. Chase Pittsenbarger, Esq.  
Nevada Bar No. 13740  
8945 W. Russell Road, Suite 330  
Las Vegas, NV 89148

11 *Attorneys for Plaintiff/Counter-Defendant,*  
12 *Green Tree Servicing LLC, now known as Ditech*  
*Financial LLC*

*Attorneys for Defendant, Silverado Court*  
*Landscape Maintenance Corporation*

13 DATED: October 1, 2015

DATED: October 1, 2015

14  
15  
16 **ORDER**

17 By stipulation of the parties and good cause appearing, IT IS HEARBY ORDERED as  
18 follows:

19 The deadline for Green Tree to file its reply in support of its Motion for Leave to File Second  
20 Amended Complaint and First Amended Answer to Counterclaim is hereby extended up to and  
21 including October 15, 2015.

22 IT IS SO ORDERED.

23  
24  
25  
26 Dated: October 8, 2015



27 U.S. MAGISTRATE JUDGE

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

On October 1, 2015, I served the **STIPULATION FOR EXTENSION OF TIME FOR PLAINTIFF TO FILE REPLY IN SUPPORT OF MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT AND FIRST AMENDED ANSWER TO FIRST AMENDED COUNTERCLAIM** by the following means to the persons as listed below:

  X   a. ECF System (you must attach the “Notice of Electronic Filing”, or list all persons and addresses and attach additional paper if necessary):

Paul R Connaghan pconnaghan@cnlawlv.com

Sean L. Anderson sanderson@leachjohnson.com, kgruchow@leachjohnson.com, rcallaway@leachjohnson.com, rreed@leachjohnson.com

Tara D Newberry tnewberry@cnlawlv.com, anewberry@cnlawlv.com, kseckinger@cnlawlv.com, myecfcnlaw@gmail.com

\_\_\_\_\_ b. United States Mail, postage fully pre-paid (List persons and addresses. Attach additional paper if necessary)

By: /s/ Rebecca Nichols  
Rebecca Nichols  
An employee of Wolfe & Wyman LLP