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 6 **Attorney for Plaintiff**  
**LAS VEGAS DEVELOPMENT GROUP, LLC**

7 UNITED STATES DISTRICT COURT  
 8 DISTRICT OF NEVADA

9 \*\*\*

10 LAS VEGAS DEVELOPMENT GROUP, LLC, )  
 11 a Nevada limited liability company, )

12 Plaintiff, )

Case No. 2:15-cv-00917-GMN-NJK

13 vs. )

14 2014-3 IH EQUITY OWNER, LP, a Delaware )  
 limited partnership; BANK OF AMERICA, )  
 15 NA, a National Banking Association; )  
 MERIDIAN FORECLOSURE SERVICE, a )  
 16 California corporation; THR NEVADA II, LP a )  
 Delaware limited partnership; THR )  
 17 PROPERTY BORROWER, LP, a Delaware )  
 limited partnership; THR PROPERTY )  
 18 GUARANTOR, LP, a Delaware limited )  
 partnership; THR PROPERTY HOLDCO, LP, a )  
 19 Delaware limited partnership; 2014-3 IH )  
 PROPERTY HOLDCO, LP, a Delaware limited )  
 20 partnership; 2014-3 IH BORROWER, LP, a )  
 Delaware limited partnership; GERMAN )  
 21 AMERICAN CAPITAL CORPORATION, a )  
 Maryland corporation; CHRISTIANA TRUST, )  
 22 an unknown business entity; DOE individuals I )  
 through XX; and ROE CORPORATIONS I )  
 23 through XX, )

24 Defendants. )

25 **STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE**

26 COMES NOW Plaintiff, LAS VEGAS DEVELOPMENT GROUP, LLC, and  
 27 Defendants, 2014-3 IH EQUITY OWNER, LP; THR NEVADA II, LP; THR PROPERTY  
 28

1 BORROWER, LP; THR PROPERTY GUARANTOR, LP; THR PROPERTY HOLDCO, LP;  
2 2014-3 IH PROPERTY HOLDCO, LP; 2014-3 IH BORROWER, LP; GERMAN AMERICAN  
3 CAPITAL CORPORATION; and CHRISTIANA TRUST, and hereby stipulate and agree as  
4 follows:

- 5 1. The instant action is primarily a quiet title action related to real property  
6 commonly known as 7832 Marksville Street, Las Vegas, Nevada 89149, Assessor  
7 Parcel No. 125-18-512-079 (*“the “Property”*). Defendant, Bank of America,  
8 N.A. (*“BANA”*) formerly held a deed of trust recorded against the Property in the  
9 Official Records of the Clark County Recorder as Instrument No.  
10 200701050001709 (*“First Deed of Trust”*).
- 11 2. The Property was the subject of a homeowners association lien foreclosure sale  
12 dated June 7, 2011 (*“HOA Foreclosure Sale”*). Plaintiff purchased the Property  
13 at the time of the HOA Foreclosure Sale. Thereafter, Meridian Foreclosure  
14 Service purported to foreclose upon the First Deed of Trust on December 3, 2012  
15 (*“Bank Foreclosure Sale”*). Defendant, THR Nevada II, LP purported to  
16 purchase the Property at the Bank Foreclosure Sale and on December 21, 2012, a  
17 Trustee Deed was recorded in the Official Records of the Clark County Recorder  
18 as Instrument No. 201212210003995, purportedly vesting title to the Property in  
19 the name of THR Nevada II, LP. The Property was thereafter the subject of a  
20 number of transfers before eventually being conveyed back to THR Nevada II, LP,  
21 which currently continues to possess record title.
- 22 3. Defendant, Bank of America, N.A., has been previously dismissed from this  
23 action. The remaining parties have entered into a settlement which resolves this  
24 matter in its entirety.
- 25 4. Title to the Property shall be quieted in the name of THR Nevada II, LP, free and  
26 clear of any interest of the Plaintiff, Las Vegas Development Group, LLC, or  
27 anyone claiming an interest in the Property through the Plaintiff.
- 28 5. The Lis Pendens recorded against the Property by the Plaintiff on March 20, 2015,

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as Doc #20150320-0001997 shall be expunged and released.  
6. The instant action shall be dismissed with prejudice in its entirety, including all remaining claims, counterclaims and crossclaims, with each party bearing its own attorneys' fees and costs.

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7. All matters at issue herein having been resolved, the instant matter shall be closed.

Dated this 20<sup>th</sup> day of September, 2023.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

HUTCHISON & STEFFEN, PLLC

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**THR Nevada II, LP, THR Property**  
**Borrower, LP, THR Property**  
**Guarantor, LP and THR Property**  
**Holdco, LP**

IT IS SO ORDERED.

By:   
Judge, U.S. District Court

Dated: September 23, 2023

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20<sup>th</sup> day of September, 2023, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE** to the following parties:

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