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10 *Attorneys for Plaintiff Crystal Torno*

11 UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

12 CRYSTAL TORNO (a.k.a. CRYSTAL A.  
 13 THOMAS-BOLDUC), an individual,

14 Plaintiff,

15 vs.

16 GREEN TREE SERVICING, LLC;  
 NATIONAL DEFAULT SERVICING  
 17 CORPORATION; and PREMIER AMERICAN  
 TITLE AGENCY, INC., FANNIE MAE; and  
 18 DOES 1-10, inclusive,

19 Defendants.

Case No. 2:15-cv-01018-APG-PAL

**STIPULATION AND ORDER EXTENDING TIME  
 FOR PLAINTIFF CRYSTAL TORNO TO FILE  
 MOTION FOR ATTORNEY’S FEES AND COSTS  
 PURSUANT TO RULE 54**

**(FIRST REQUEST)**

20  
 21 Pursuant to Local Rules IA 6-1, LR 54-1(a), LR 54-14, and Federal Rule of Civil Procedure  
 22 54, Plaintiff Crystal Torno (“Ms. Torno”), Defendant Green Tree Servicing, LLC (“Green Tree”) and Defendant Federal National Mortgage Association (“Fannie Mae”) (collectively, the “Parties”) 23  
 24 hereby stipulate and agree as follows:

25 1. On December 27, 2017, the Court Clerk entered judgment in favor of Ms. Torno  
 26 based on her acceptance of an offer of judgment served by Green Tree and Fannie Mae. (ECF No.  
 27 134.)  
 28

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1           2. Pursuant Federal Rule of Civil Procedure 54(d), LR 54-1(a), and LR 54-14, Ms.  
2 Torno calculates her deadline to file (i) a Motion for Attorney’s Fees and (ii) a Bill of Costs and  
3 Disbursements as January 10, 2018.

4           3. The Parties have engaged in, and continue to engage in, advanced settlement  
5 negotiations to resolve this action and a state court action involving Ms. Torno and Fannie Mae.

6           4. The Parties hereby stipulate to extend the time allowed for Ms. Torno to file a Motion  
7 for Attorney’s Fees and a Bill of Costs and Disbursements from January 10, 2018 to February 9,  
8 2018.

9           5. Green Tree and Fannie Mae object to and dispute the merits of any such motion and  
10 Plaintiff’s ability to seek attorneys’ fees and costs. Green Tree and Fannie Mae reserve the right to  
11 object, and will object, to any motion for fees and costs that may be filed. Green Tree and Fannie  
12 Mae’s stipulation is expressly limited to Plaintiff’s request to extend the deadline to file any such  
13 motion.

14           6. The reason for this request is to accommodate the schedules of Ms. Torno’s counsel  
15 and to enable the Parties to continue to engage in settlement negotiations in an effort to resolve this  
16 matter, preserving judicial resources and avoiding unnecessary litigation expenses.

17           DATED this 10<sup>th</sup> day of January, 2018.

18 BAILEY ❖ KENNEDY

SNELL & WILMER, L.L.P.

19 By: /s/ Paul C. Williams

By: /s/ Robin E. Perkins

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**ORDER**

IT IS SO ORDERED:

The deadline for Ms. Torno to file (i) a Motion for Attorney’s Fees and (ii) a Bill of Costs and Disbursements is extended from January 10, 2018 to February 9, 2018

  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

Dated: 1/10/2018

Respectfully Submitted by:

BAILEY ❖ KENNEDY

By: /s/ Paul C. Williams  
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