

1 DENNIS L. KENNEDY
 Nevada Bar No. 1462
 2 JOSHUA M. DICKEY
 Nevada Bar No. 6621
 3 PAUL C. WILLIAMS
 Nevada Bar No. 12524
 4 AMANDA L. STEVENS
 Nevada Bar No. 13966
 5 **BAILEY ♦ KENNEDY**
 8984 Spanish Ridge Avenue
 6 Las Vegas, Nevada 89148-1302
 Telephone: 702.562.8820
 7 Facsimile: 702.562.8821
 DKennedy@BaileyKennedy.com
 8 JDickey@BaileyKennedy.com
 PWilliams@BaileyKennedy.com
 9 AStevens@BaileyKennedy.com

10 [Additional Attorneys on Signature Page]

11 *Attorneys for Plaintiff*

BAILEY ♦ KENNEDY
 8984 SPANISH RIDGE AVENUE
 LAS VEGAS, NEVADA 89148-1302
 702.562.8820

12 UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA

14 CRYSTAL TORN0 (a.k.a. CRYSTAL A.
 THOMAS-BOLDUC), an individual,

15 Plaintiff,

16 vs.

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

20 Defendants.
21

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

**STIPULATION AND ORDER EXTENDING TIME
 FOR PLAINTIFF CRYSTAL TORN0 TO FILE
 HER RESPONSE TO DEFENDANTS FANNIE
 MAE AND GREEN TREE SERVICING, LLC’S
 MOTION TO STAY DISCOVERY [ECF No. 33]**

(FIRST REQUEST)

22 Pursuant to Local Rule 7-1, Plaintiff Crystal Torno (“Ms. Torno”), Defendant Green Tree
 23 Servicing, LLC (“Green Tree”), Defendant Federal National Mortgage Association (“Fannie Mae”),
 24 and Defendant National Default Servicing Corporation (“National Default”) (collectively, the
 25 “Parties”) hereby stipulate and agree as follows:

26 1. On December 4, 2015, Fannie Mae and Green Tree filed their Motion to Stay
 27 Discovery (the “Motion to Stay”). (ECF No. 33.) On December 4, 2015, Ms. Torno filed her Notice
 28 of Intent to File Opposition to the Motion to Stay. (ECF No. 34.)

1 2. On December 15, 2015, this Court held a Status/Dispute Resolution Conference and
2 set a hearing on the Motion to Stay for January 12, 2016, at 10:00 a.m. (*See* ECF No. 42.)

3 3. Ms. Torno’s Response to the Motion to Stay is currently due on December 21, 2015.

4 4. The Parties hereby stipulate to extend the time allowed for Ms. Torno to file her
5 response to the Motion to Stay by three days—from December 21, 2015, to December 24, 2015.
6 The reason for this request is to accommodate the schedules of Ms. Torno’s counsel.

7 5. Fannie Mae and Green Tree’s reply brief will be due within seven days after the
8 Plaintiff’s Response is served, pursuant to LR 7-2(e), on or before January 6, 2016.

9 DATED this 18th day of December, 2015.

10 BAILEY ♦ KENNEDY

GREENBERG TRAURIG, LLP

11 By: /s/ Paul C. Williams

By: /s/ Jacob D. Bundick

12 DENNIS L. KENNEDY
13 JOSHUA M. DICKEY
14 PAUL C. WILLIAMS
15 AMANDA L. STEVENS

MARK E. FERRARIO, ESQ.
JACOB D. BUNDICK, ESQ.
JENNIFER L. GRAY, ESQ. (*Admitted Pro Hac Vice*)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, NV 89169
Phone: (702) 792-3773
Facsimile: (702) 792-9002
ferrariom@gtlaw.com
bundickj@gtlaw.com
grayjen@gtlaw.com

16 GEORGE H. HAINES
17 DAVID H. KRIEGER
18 HAINES & KRIEGER
8985 South Eastern Avenue, Suite 130
Las Vegas, Nevada 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
GHaines@hainesandkrieger.com
DKrieger@hainesandkrieger.com

Attorneys for Defendants

GREEN TREE SERVICING LLC and FANNIE
MAE

19 *Attorneys for Plaintiff*

20 TIFFANY & BOSCO, P.A.

21 By: /s/ Kevin Soderstrom

22 GREGORY L. WILDE, ESQ.
23 KEVIN SODERSTROM, ESQ.,
24 MATTHEW D. DAYTON, ESQ.
25 212 South Jones Blvd.
26 Las Vegas, NV 89107
Phone: (702) 258-8200
Facsimile: (702) 258-8787
efilenv@tblaw.com
kss@tblaw.com
md@tblaw.com

Attorneys for Defendant

27 NATIONAL DEFAULT SERVICING
28 CORPORATION

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

ORDER

IT IS SO ORDERED:

The deadline for Ms. Torno to file her response to the Motion to Stay is hereby extended from December 21, 2015 to December 24, 2015. The deadline for Fannie Mae and Green Tree to file a reply brief is January 6, 2016.


UNITED STATES MAGISTRATE JUDGE

Dated: December 22, 2015

Respectfully Submitted by:

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams
DENNIS L. KENNEDY
JOSHUA M. DICKEY
PAUL C. WILLIAMS
AMANDA L. STEVENS

HAINES & KRIEGER
GEORGE H. HAINES
DAVID H. KRIEGER
Attorneys for Plaintiffs