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MARQUIS AURBACH COFFING

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	jgerber@maclaw.com			
6	bviellion@maclaw.com Attorneys for Defendants			
7	Michael S. Talbott, Cindy Talbott,	T .		
8	Leroy Wilder, and the Leroy and Nancy Wilder Trust			
0	UNITED STATES DISTRICT COURT			
9	DISTRICT OF NEVADA			
10	ATHENE ANNUITY AND LIFE INSURANCE			
11	COMPANY,			
12	Plaintiff,	Case No.:	2:16-cv-00160-GMN-PAL	
	T failtin,			
13	VS.			
14	MICHAEL S. TALBOTT; CINDY TALBOTT;			
15	SCOTT KELLER AND KAREN KELLER, as indviduals; LEROY WILDER, both individually			
	and as trustee of the LEROY AND NANCY			
16	WILDER TRUST; and the LEROY AND NANCY WILDER TRUST,			
17				
18	Defendants.			
19	STIDULATION AND ODDED	TO SET AST	ПЕ ПЕЕЛІЦ Т	
17	STIPULATION AND ORDER	IU SEI ASI	DE DEFAULT	

Plaintiff Athene Annuity and Life Company, by and through its attorneys of record,
Latham & Watkins LLP, and Defendants Michael S. Talbott, Cindy Talbott, Leroy Wilder, both
individually and as trustee of the Leroy and Nancy Wilder Trust, and the Leroy and Nancy
Wilder Trust, by and through their attorneys of record, Marquis Aurbach Coffing, hereby
stipulate and agree to the following:

1. To set aside the default entered by Plaintiff on February 24, 2016 against
Defendants Michael S. Talbott and Cindy Talbott and on February 25, 2016 against Defendants
Leroy Wilder and the Leroy and Nancy Wilder Trust (collectively referred to hereinafter as the
"Defendants").

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	1	2. Defendants shall file their answer	s on or before March 21, 2016, and agree not to			
	2	seek any further extension with regard to the filing of their answers.				
	3	IT IS SO STIPULATED AND AGREED.				
(702) 382-0711 FAX: (702) 382-5816	4		ated this 14th day of March, 2016.			
	5		ATHAM & WATKINS LLP			
	6					
	7	By: /s/ Jason M. Gerber B Jason M. Gerber, Esq.	y: /s/ Amy C. Quartarolo Kimberly A Posin, Esq.			
	8	Nevada Bar No. 9812 Bryan M. Viellion, Esq.	CA Bar No. 223091 – Pro Hac Vice Pending Amy C. Quartarolo, Esq.			
	9	Nevada Bar No. 13607 10001 Park Run Drive	CA Bar No. 222144 – Pro Hac Vice Pending 355 S. Grand Avenue			
	10	Las Vegas, Nevada 89145 Attorneys for Defendants	Los Angeles, CA, 90071-1560 Attorney for Plaintiff			
	11	Michael S. Talbott, Cindy Talbott, Leroy Wilder, and the Leroy and Nancy				
	12	Wilder Trust				
	13	ODDED				
	14	IT IS SO ORDERED this <u>15</u> day of <u>March</u> , 2016.				
	15					
	16					
	17					
	18	Submitted by:				
	19	MARQUIS AURBACH COFFING				
	20					
	21	By: /s/ Jason M. Gerber				
	22	Jason M. Gerber, Esq. Nevada Bar No. 9812				
	23	Bryan M. Viellion, Esq. Nevada Bar No. 13607				
	24	10001 Park Run Drive Las Vegas, Nevada 89145				
	25 26	Attorneys for Defendants Michael S. Talbott, Cindy Talbott, Leroy Wilder, and the Leroy and Nancy Wilder Trust				
	26 27					
	27 28					
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