

1 **SAO**
 2 GREGORY L. WILDE, ESQ.
 3 Nevada Bar No. 4417
 4 **TIFFANY & BOSCO, P.A.**
 5 212 S. Jones Blvd.
 6 Las Vegas, Nevada 89107
 7 Tel (702) 258-8200
 8 Fax (702) 258-8787
 9 Attorney for Defendant
 10 SPECIALIZED LOAN SERVICING, LLC.
 11 *TB # 16-71150*

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

Case No.: 2:16-CV-0220

11 UNITED STATES OF AMERICA

12 Plaintiff,

13 v.

14 ROBERT C. SHAW, ROSE O. SHAW,
 15 SAINT ANDREWS IVY, B.T.,
 16 SPECIALIZED LOAN SERVICING, LLC
 17 CLARK COUNTY, NEVADA, and
 18 AMERICAN EXPRESS CENTURION
 19 BANK,

Defendant(s).

20 **ORDER RE: DEFENDANT SPECIALIZED**
 21 **LOAN SERVCING, LLC.**

22 It is hereby Stipulated and Agreed, by and between Plaintiff and Defendant
 23 SPECIALIZED LOAN SERVICING, LLC., (hereinafter “SECURED LENDER”), by
 24 and through their respective counsel, as follows:

25 1. This matter concerns real property located at 638 Saint Andrews Road,
 26 Henderson, NV 89015 (hereinafter the “Subject Property”).
 27
 28

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1 2. SECURED LENDER is the holder of a beneficial interest in the Subject
2 Property by virtue of that certain deed of trust dated recorded on or about September 25,
3 2003, (hereinafter the “Deed of Trust”), as Book and Instrument No. 20030925.05283 in
4 the Official Records of the Clark County Recorder’s Office (hereinafter the “Official
5 Records”).
6

7 3. The Deed of Trust secures a certain note (hereinafter the “Note”) executed
8 by borrower Defendant Richard C. Shaw in the original principal amount of \$169,000.00,
9 which was loaned against the subject property.
10

11 4. Plaintiff asserts that it is owed money from the Defendants arising from
12 federal tax liens, which encumber the Subject Property, as more fully detailed in the
13 Amended Complaint filed on or about February 29, 2016, Docket #11.
14

15 5. In the interest of avoiding unnecessary attorney’s fees and court costs,
16 Defendant SECURED LENDER agrees not to contest this matter or any foreclosure sale
17 of the Subject Property by the Plaintiff. However, Defendant SECURED LENDER
18 reserves all of its rights to effectuate collection of the amount owed on the underlying
19 debt which it is owed by the Borrower Defendant Richard C. Shaw personally, which
20 may include foreclosure.
21

22 6. Plaintiff agrees that the security interest of Defendant SECURED
23 LENDER is superior to those interests of Plaintiff as more fully detailed in the Amended
24 Complaint filed on or about February 29, 2016, Docket #11.
25

26 7. Defendant SECURED LENDER will take no further action against the
27 Subject Property during the pendency of this action, or until further order of this Court in
28 the event this matter is unreasonably delayed, and Defendant SECURED LENDER is no
longer required to participate in this action, except that Defendant SECURED LENDER

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1 will respond to reasonable discovery requests served on its undersigned counsel. Subject
2 to terms of this pleading, Defendant SECURED LENDER agrees to be bound by any
3 Court order, ruling, or judgment in this matter.

4
5 8. Additionally, Defendant SECURED LENDER is not subject to any award
6 of damages, court costs, or attorney's fees so long as it complies with the terms of this
7 Stipulation.

8 Dated this 15th day of April, 2016. Dated this 15th day of April, 2016.

9 **TIFFANY & BOSCO, P.A.**

U.S. DEPARTMENT OF JUSTICE

10 /s/ Gregory L. Wilde

/s/ Dylan C. Cerling

11
12 _____
13 GREGORY L. WILDE, ESQ.
14 Nevada Bar No. 4417
15 212 S. Jones Boulevard
16 Las Vegas, NV 89107
17 Attorney for Defendant
18 Specialized Loan Servicing, LLC.

19 _____
20 DYLAN C. CERLING, ESQ.
21 Trial Attorney, Tax Division
22 P.O. Box 683
23 Washington, D.C. 20044
24 Attorney for Plaintiff

25 **ORDER**

26 **IT IS SO ORDERED** this 25th day of April, 2016.

27
28 

DISTRICT COURT JUDGE
KENT J. DAWSON

Submitted by:

29 **TIFFANY & BOSCO, P.A.**

30 /s/ Gregory L. Wilde

31 _____
32 GREGORY L. WILDE, ESQ.
33 Nevada Bar No. 4417
34 212 S. Jones Boulevard
35 Las Vegas, NV 89107
36 Attorney for Defendant
37 Specialized Loan Servicing, LLC.