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_	Nevada Bar No. 9578	
5	E-mail: karen@kgelegal.com KIM GILBERT EBRON	
6	7625 Dean Martin Drive, Suite 110	
7	Las Vegas, Nevada 89139	
′	Telephone: (702) 485-3300 Facsimile: (702) 485-3301	
8	Attorneys for SFR Investments Pool 1, LLC	
9	UNITED STATES	DISTRICT COURT
10		OF NEVADA
10	WILMINGTON TRUST COMPANY, AS	Case No. 2:16-cv-0
11	TRUSTEE FOR THE BEAR STEARNS ALT-	
12	A TRUST, MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2007-1,	CTIDIII ATION A
	CERTIFICATES SERIES 2007-1,	STIPULATION A DISPOSITIVE MO
13	Plaintiff,	
14	VS.	(First Request)
	SFR INVESTMENTS POOL 1, LLC, a	
15	Nevada limited liability company; CLUB AT MADEIRA CANYON UNIT OWNERS'	
16	ASSOCIATION; DOES I through X,	
	inclusive; and ROW CORPORATIONS I	
17	through X, inclusive,	
18	Defendants.	
19	SFR INVESTMENTS POOL 1, LLC, a	
1)	Nevada limited liability company,	
20	Counter-Claimant,	
21	VS.	
	WILMINGTON TRUST COMPANY, AS	
22	TRUSTEE FOR THE BEAR STEARNS ALT-A TRUST, MORTGAGE PASS-	
23	THROUGH CERTIFICATES SERIES 2007-	
,	1; NATIONSTAR MORTGAGE, LLC, a	
24	Delaware limited liability company; MORTGAGE ELECTRONIC	
25	REGISTRATION SYSTEMS, INC., a	
26	Delaware corporation, as nominee beneficiary	
٥ ا	for PULTE MORTGAGE, LLC; HAMLET McNEACE, an individual; and SHAWN	
27	McNEACE, an individual,	
28	Counter-Defendant/Cross-Defendants	

Case No. 2:16-cv-00326-RFB-PAL

STIPULATION AND ORDER TO STAY DISPOSITIVE MOTIONS DEADLINE

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WHEREAS Plaintiff/Counter-Defendant, WILMINGTON TRUST COMPANY, AS TRUSTEE FOR THE BEAR STEARNS ALT-A TRUST, MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2007-1 (the "Bank") filed a Motion to Amend Complaint and Caption on September 12, 2016 [ECF No. 35]; and

WHEREAS an Order regarding Plaintiff's Motion to Amend Complaint and Caption [ECF No. 35] has not yet been entered;

IT IS HEREBY STIPULATED between the Bank, Counter-Defendant NATIONSTAR MORTGAGE, LLC ("Nationstar"), Counter-Defendant MORTGAGE **ELECTRONIC** REGISTRATION SYSTEMS, INC. ("MERS") and Defendant/Counterclaimant INVESTMENTS POOL 1, LLC ("SFR") (collectively "the Parties"), by and through their undersigned counsel, to extend and stay the dispositive motions deadline in this matter. As grounds therefore, the parties state as follows:

- 1. Discovery in this case closed on December 12, 2016. [ECF No. 34], 3:5-7. The dispositive motions deadline is currently January 9, 2017. Id., at 3:27-28.
- The Bank filed a Motion to Amend Complaint and Caption on September 12, 2016 ("Bank Mot.) [ECF No. 35]. No opposition has been filed and the Bank filed a Notice of Non-Opposition to Plaintiff's Motion to Amend Complaint and Caption on October 27, 2016 [ECF No. 37].
- 3. The Bank Mot. seeks to add Nevada Association Services, Inc. ("NAS") as a party and the proposed Plaintiff's First Amended Complaint ("Amended Complaint") modifies the Causes of Action against the existing parties. [ECF No. 35-1.]
- 4. Because the Court has not yet entered an Order regarding the Bank Mot. and, if granted, the proposed Amended Complaint, which will impact the briefing on the parties respective dispositive motions, will not be filed until after the current January 9, 2017 dispositive motion deadline, good cause exists to extend the dispositive motions deadline.
- 5. Additionally pending before this Court is SFR's motion to certify the question of law regarding the statutory interpretation of NRS 116.31168 to the Nevada Supreme Court. [ECF No. 38.] If this Court grants the motion to certify and the Nevada Supreme Court

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KIM GILBERT EBRON

7625 DEAN MARTIN DRIVE, SUITE 110 LAS VEGAS, NEVADA 89139 (702) 485-3300 FAX (702) 485-3301

accepts the question,	then the	legal	analysis	for t	the	arguments	in	the	dispositive	e motion
may be significantly a	affected.									

- 6. This is the parties' first request for an extension and is not intended to cause any delay or prejudice to any party.
- 7. Accordingly, the parties stipulate and respectfully request the court stay the dispositive motions deadline to allow sufficient time for the court to rule on the pending Bank Mot. and Motion to Certify. Once the Court rules on the pending motions, within 14 days the parties will file a Joint Status Report with a new proposed plan with (1) new discovery dates based on the addition of a new party dates; (2) new dates for the dispositive motions deadline; and/or (3) proposed stay pending resolution of the certified question. , if necessary, new discovery dates based on the addition of a new party, or a request for stay pending a decision by the Nevada Supreme Court.

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KIM GILBERT EBRON /s/Jacqueline A. Gilbert Diana Cline Ebron, Esq. Nevada Bar No. 10580 Jacqueline A. Gilbert, Esq. Nevada Bar No. 10593 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Attorneys for SFR Investments Pool 1, LLC Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certig 2007-1, Nationstar Mortgage	1	nding the foregoing, the stay shall not affect the right of any	party to file
DATED this 6th day of January, 2017. DATED this 6th day of January KIM GILBERT EBRON KIM GILBERT EBRON WRIGHT, FINLAY & ZAK /s/Jacqueline A. Gilbert Diana Cline Ebron, Esq. Nevada Bar No. 10580 Jacqueline A. Gilbert, Esq. Nevada Bar No. 10593 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Attorneys for SFR Investments Pool 1, LLC Attorneys for SFR Investments Pool 1, LLC Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage I Mortgage Electronic Registrat Inc. ORDER IT IS SO ORDERED. DATED this 6th day of January /s/Rock K. Jung Edgar C. Smith, Esq. Nevada Bar No. 10906 7785 W. Sahara Ave., Suite 20 Las Vegas, Nevada 89117 Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage I Mortgage Electronic Registrat Inc. ORDER IT IS SO ORDERED. DATED this 9th day of January, 2017.	2	motions solely on the legal effect of <i>Bourne Valley Court Trust v</i> .	Wells Fargo
DATED this 6th day of January, 2017. DATED this 6th day of January KIM GILBERT EBRON WRIGHT, FINLAY & ZAK WRIGHT, FINLAY & ZAK S/Jacqueline A. Gilbert Diana Cline Ebron, Esq. Nevada Bar No. 10580 Jacqueline A. Gilbert, Esq. Nevada Bar No. 10593 T625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Attorneys for SFR Investments Pool 1, LLC Attorneys for SFR Investments Pool 1, LLC TISSO ORDERED. DATED this 9th day of January, 2017. Respectfully submitted by: KIM GILBERT EBRON ///Jacqueline A. Gilbert DIANA CLINE EBRON, Esq. Nevada Bar No. 10580 DATED this 6th day of January WRIGHT, FINLAY & ZAK ///S/Rock K. Jung Edgar C. Smith, Esq. Nevada Bar No. 5506 Rock K. Jung, Esq. Nevada Bar No. 10906 7785 W. Sahara Ave., Suite 20 Las Vegas, Nevada 89117 Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage Mortgage Electronic Registrat Inc. ORDER IT IS SO ORDERED. DATED this 9th day of January, 2017.	3	832 F.3d 1154 (9th Cir. 2016).	
KIM GILBERT EBRON KIM GILBERT EBRON WRIGHT, FINLAY & ZAK /s/Rock K. Jung Diana Cline Ebron, Esq. Nevada Bar No. 10580 Nevada Bar No. 10593 Attorneys for SFR Investments Pool 1, LLC IST IS SO ORDERED. DATED this 9th day of January, 2017. Respectfully submitted by: KIM GILBERT EBRON WRIGHT, FINLAY & ZAK /s/Rock K. Jung Edgar C. Smith, Esq. Nevada Bar No. 5506 Rock K. Jung, Esq. Nevada Bar No. 10906 7785 W. Sahara Ave., Suite 20 Las Vegas, Nevada 89117 Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage I Mortgage Electronic Registrat Inc. ORDER IT IS SO ORDERED. DATED this 9th day of January, 2017. WINTED STATES MAGE UNITED STATES MAGE Las Vegas, Nevada Bar No. 10580	4		
Association	5	lay of January, 2017. DATED this 6th day of January, 201	.7.
8 Nevada Bar No. 10580 9 Jacqueline A. Gilbert, Esq. Nevada Bar No. 10593 10 Las Vegas, Nevada 89139 11 Attorneys for SFR Investments Pool 1, LLC 12 Attorneys for SFR Investments Pool 1, LLC 13 ORDER 14 ORDER 15 ORDER 16 ORDER 17 ORDER 18 IT IS SO ORDERED. 19 DATED this 9th day of January, 2017. 20 Las Vegas, Nevada Bar No. 10580 21 Respectfully submitted by: 22 KIM GILBERT EBRON 23 Nevada Bar No. 10580 24 Diana Cline Ebron, Esq. Nevada Bar No. 10906 7785 W. Sahara Ave., Suite 20 Las Vegas, Nevada 89117 Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage Inc. ORDER 15 ORDER 16 ORDER 17 LIC ORDER 18 ORDER 19 DATED this 9th day of January, 2017.	6	EBRON WRIGHT, FINLAY & ZAK, LLP	ı
Diana Cline Ebron, Esq. Nevada Bar No. 10580 Jacqueline A. Gilbert, Esq. Nevada Bar No. 10593 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Attorneys for SFR Investments Pool 1, LLC Attorneys for SFR Investments Pool 1, LLC Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage Ilectronic Registrat Inc. ORDER IT IS SO ORDERED. DATED this 9th day of January, 2017. Respectfully submitted by: KIM GILBERT EBRON /s/Jacqueline A. Gilbert DIANA CLINE EBRON, Esq. Nevada Bar No. 10580 Rock K. Jung, Esq. Nevada Bar No. 10906 7785 W. Sahara Ave., Suite 20 Las Vegas, Nevada 89117 Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage Ilectronic Registrat Inc. ORDER IT IS SO ORDERED. UNITED STATES MAGE: **SAJacqueline A. Gilbert** DIANA CLINE EBRON, Esq. Nevada Bar No. 10580	7	Gilbert /s/Rock K. Jung	
Jacqueline A. Gilbert, Esq. Nevada Bar No. 10593 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Attorneys for SFR Investments Pool 1, LLC Attorneys for SFR Investments Pool 1, LLC Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage I Mortgage Electronic Registrat Inc. ORDER IT IS SO ORDERED. DATED this 9th day of January, 2017. Respectfully submitted by: KIM GILBERT EBRON /s/Jacqueline A. Gilbert DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580	8	n, Esq. Edgar C. Smith, Esq.	
7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Attorneys for SFR Investments Pool 1, LLC 12 13 14 15 16 17 18 18 19 ORDER IT IS SO ORDERED. DATED this 9th day of January, 2017. 20 21 22 23 24 Respectfully submitted by: KIM GILBERT EBRON /// S/Jacqueline A. Gilbert DIANA CLINE EBRON, ESQ. Nevada Bar No. 10906 7785 W. Sahara Ave., Suite 20 Las Vegas, Nevada 89117 Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage I Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Plectronic Registrat Inc. UNITED STATES MAGE **Comparison of the Comparison of the Comp	9	bert, Esq. Rock K. Jung, Esq.	
Attorneys for SFR Investments Pool 1, LLC Las Vegas, Nevada 89117 Attorneys for Wilmington Trus Trustee for the Bear Stearns A Mortgage Pass-Through Certi; 2007-1, Nationstar Mortgage I Mortgage Electronic Registrat Inc. ORDER IT IS SO ORDERED. DATED this 9th day of January, 2017. Respectfully submitted by: KIM GILBERT EBRON /// // // // // // // // // // // //	10	n Drive, Suite 110 Nevada Bar No. 10906	
Trustee for the Bear Stearns A Mortgage Pass-Through Certi, 2007-1, Nationstar Mortgage I Mortgage Electronic Registrat Inc. 15 16 17 18 IT IS SO ORDERED. DATED this 9th day of January, 2017. 20 21 Respectfully submitted by: KIM GILBERT EBRON 23 24 DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580	11	Investments Pool 1 IIC Las Vegas, Nevada 8911/	many as
2007-1, Nationstar Mortgage Mortgage Electronic Registrat Inc. 15 16 17 ORDER IT IS SO ORDERED. 19 DATED this 9th day of January, 2017. 20 21 Respectfully submitted by: KIM GILBERT EBRON 23 24 S/Jacqueline A. Gilbert DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580	12	Trustee for the Bear Stearns ALT-A	Trust,
14 15 16 17 18 18 19 19 20 21 21 Respectfully submitted by: KIM GILBERT EBRON 23 24 DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580	13	Mortgage Pass-Through Certificates 2007-1, Nationstar Mortgage LLC a	
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17 18 19 19 20 21 22 Respectfully submitted by: 23 24 24 25 Nevada Bar No. 10580	15		
IT IS SO ORDERED. DATED this 9th day of January, 2017. UNITED STATES MAGIS Respectfully submitted by: KIM GILBERT EBRON /s/Jacqueline A. Gilbert DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580	16		
DATED this 9th day of January, 2017. DATED this 9th day of January, 2017. UNITED STATES MAGIS Respectfully submitted by: KIM GILBERT EBRON /s/Jacqueline A. Gilbert DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580	17	<u>ORDER</u>	
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22 KIM GILBERT EBRON 23 /s/Jacqueline A. Gilbert DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580	21	UNITED STATES MAGISTRA	TE JUDGE
24		tted by:	
DIANA ČLINE EBRON, ESQ. Nevada Bar No. 10580	23	EBRON	
Nevada Bar No. 10580	24		
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Nevada Bar No. 10593 7625 Dean Martin Drive, Suite 110		0593	
Las Vegas, Nevada 89139 Attorneys for SFR Investments Pool 1, LLC	_]	a 89139	

Case 2:16-cv-00326-RFB-PAL Document 41 Filed 01/06/17 Page 5 of 5

	1	CERTIFICATE OF SERVICE								
(702) 485-3300 FAX (702) 485-3301	2	I HEREBY CERTIFY that on this 6th day of January 2017, pursuant to FRCP 5, I served via								
	3	the CM-ECF electronic filing system the foregoing STIPULATION AND ORDER TO								
	4	STAY DISPOSITIVE MOTIONS DEADLINE to the following parties:								
	5									
	6	Edgar C Smith Dana Jonathon Nitz								
	7	Rock K. Jung Wright Finlay & Zak, LLP								
	8	7785 W. Sahara Ave., Suite 200								
	9	Las Vegas, NV 89117 702-475-7964								
	10	Fax: 702-946-1345 Email: esmith@wrightlegal.net								
	11	Email: dnitz@wrightlegal.net Email: rjung@wrightlegal.net								
	12									
	13	Attorneys for WILMINGTON TRUST COMPANY, AS TRUSTEE FOR THE BEAR STEARNS ALT-A TRUST, MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2007-1								
	14	/s/ Jacqueline A. Gilbert An Employee of Kim Gilbert Ebron								
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