

Snell & Wilmer

LLP  
LAW OFFICES  
50 West Liberty Street, Suite 510  
Reno, Nevada 89501  
775-785-9440

1 Amy F. Sorenson, Esq.  
Nevada Bar No. 12495  
2 Nathan G. Kanute, Esq.  
Nevada Bar No. 12413  
3 Snell & Wilmer L.L.P.  
50 West Liberty Street, Suite 510  
4 Reno, Nevada 89501-1961  
Telephone: (775) 785-5440  
5 Facsimile: (775) 785-5441  
asorenson@swlaw.com  
6 nkanute@swlaw.com  
7 *Attorneys for Wells Fargo Bank, N.A. and  
Federal Home Loan Mortgage Corporation*

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

11  
12  
13 COLLEGIUM FUND SERIES 32, a Nevada  
limited-liability company,

14 Plaintiff,

15 v.

16 MARK DANIEL SNYDER, an individual;  
17 WELLS FARGO BANK, N.A.; DOES I  
THROUGH X; and ROE  
18 CORPORATIONS 1 THROUGH 10,

19 Defendants.

20 WELLS FARGO BANK, N.A., a national  
21 banking association,

22 Counter-Claimants,

23 v.

24 COLLEGIUM FUND SERIES 32, a Nevada  
limited-liability company, ABSOLUTE  
25 COLLECTION SERVICES, LLC, a Nevada  
limited liability company; NUEVO VISTA  
26 HOMEOWNERS ASSOCIATION, INC., a  
Nevada non-profit cooperative corporation,

27 Counter-Defendants.  
28

Case No.: 2:16-cv-01640-JCM-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
FEDERAL HOME LOAN  
MORTGAGE CORPORATION'S  
MOTION FOR SUMMARY  
JUDGMENT**

**(FIRST REQUEST)**

1 FEDERAL HOME LOAN MORTGAGE  
2 CORPORATION,

3 Counter-Claimants,

4 v.

5 COLLEGIUM FUND SERIES 32, a Nevada  
6 limited-liability company, ABSOLUTE  
7 COLLECTION SERVICES, LLC, a Nevada  
8 limited liability company; NUEVO VISTA  
9 HOMEOWNERS ASSOCIATION, INC., a  
10 Nevada non-profit cooperative corporation,

11 Counter-Defendants.

12 Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation  
13 (“Freddie Mac”), Collegium Fund Series 32 (“Collegium Fund”), Absolute Collection Services, LLC  
14 (“ACS”), and Nuevo Vista Homeowners Association, Inc. (the “HOA”), by and through their  
15 respective counsel, hereby respectfully request that the Court enter an order, pursuant to Local Rules  
16 6-1 and 7-1, extending the time for Collegium Fund, ACS, and the HOA to respond to the Motion  
17 for Summary Judgment (the “MSJ”) filed by Freddie Mac on January 17, 2017 [ECF No. 26] and  
18 joined by Wells Fargo on January 20, 2017 [ECF No. 29]. The response to the MSJ is currently due  
19 on February 7, 2017. The Parties have agreed to extend this response date to March 7, 2017.

20 The extension is being sought in good faith and will not unduly delay this litigation. This  
21 request is made based on the volume of litigation currently pending on related matters. Additionally,  
22 Collegium Fund, the HOA, and ACS would like some additional time to review the discovery  
23 responses previously provided by Wells Fargo and Freddie Mac to respond to the MSJ.

24 Accordingly, the Parties respectfully request that the Court grant this Stipulation and extend  
25 the time to respond to the MSJ from February 7, 2017 to March 7, 2017.

26 DATED this 6<sup>th</sup> day of February, 2017.

27 CONNAGHAN|NEWBERRY

28 SNELL & WILMER L.L.P.

29 /s/Paul Connaghan (with permission)

30 /s/Nathan Kanute

31 Paul R. Connaghan, Esq.

32 Amy F. Sorenson, Esq. (NV Bar No. 12495)

33 Nevada Bar No. 3229

34 Nathan G. Kanute, Esq. (NV Bar No. 12413)

35 Tara D. Newberry, Esq.

36 50 W. Liberty Street, Suite 1510

37 Nevada Bar No. 10696

38 Reno, NV 89501-1961

39 7854 W. Sahara Avenue

40 *Attorneys for Wells Fargo Bank, N.A. and*

41 Las Vegas, NV 89117

42 *Federal Home Loan Mortgage Corporation*

43 *Attorneys for Collegium #32*

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

ABSOLUTE COLLECTION SERVICES, LLC

PENGILLY LAW FIRM


/s/ Shane Cox (with permission)

/s/ Elizabeth Lowell (with permission)

Shane D. Cox, Esq.  
Nevada Bar No. 13852  
8440 w. Lake Mead Blvd., Ste. 210  
Las Vegas, NV 89128  
*Attorneys for Absolute Collection Services*

Elizabeth B. Lowell, Esq.  
Nevada Bar No. 8551  
David Markman, Esq.  
Nevada Bar No. 12440  
1995 Village Center Circle, Ste. 190  
Las Vegas, NV 89134  
*Attorneys for Nuevo Vista HOA*

**IT IS SO ORDERED.**

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

DATED: February 7, 2017

**CERTIFICATE OF SERVICE**

1  
2 As an employee of Snell & Wilmer L.L.P., I certify that I served a copy of the foregoing  
3 **STIPULATION AND ORDER TO EXTEND TIME TO OBJECT TO THE FEDERAL**  
4 **HOME LOAN MORTGAGE CORPORATION'S MOTION FOR SUMMARY JUDGMENT**  
5 on the 6<sup>th</sup> day of February, 2017 by the method indicated:

- 6  **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax  
7 number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule  
8 7.26(a). A printed transmission record is attached to the file copy of this  
9 document(s).
- 10  **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope  
11 with postage thereon fully prepaid, in the United States mail at Reno, Nevada  
12 addressed as set forth below.
- 13  **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an  
14 overnight delivery service company for delivery to the addressee(s) on the next  
15 business day.
- 16  **BY PERSONAL DELIVERY:** by causing personal delivery by \_\_\_\_\_, a  
17 messenger service with which this firm maintains an account, of the document(s)  
18 listed above to the person(s) at the address(es) set forth below.
- 19  **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for  
20 electronic filing and service upon the Court's Service List for the above-referenced  
21 case.

22 Shane D. Cox, Esq.  
23 Absolute Collection Services, LLC  
24 8440 W Lake Mead Blvd Ste 210  
25 Las Vegas, Nevada 89128

26 James W. Pengilly, Esq.  
27 Elizabeth B. Lowell, Esq.  
28 Pengilly Law Firm  
1995 Village Center Cir., Suite 190  
Las Vegas, NV 89134

Paul R. Connaghan, Esq.  
Tara D. Newberry, Esq.  
Connaghan Newberry Law Firm  
7854 W Sahara Ave.  
Las Vegas, NV 89117

/s/ Lara J. Taylor  
An employee of Snell & Wilmer L.L.P.