

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**

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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 FILE REPLY IN  
SUPPORT OF 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  
HOMEOWNERS ASSOCIATION, INC., a  
Nevada non-profit cooperative corporation,

Counter-Defendants.

9 Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation  
10 (“Freddie Mac”), Collegium Fund LLC, Series 32 (“Collegium Fund”), Absolute Collection  
11 Services, LLC (“ACS”), and Nuevo Vista Homeowners Association, Inc. (the “HOA”), by and  
12 through their respective counsel, hereby respectfully request that the Court enter an order, pursuant  
13 to Local Rules 6-1 and 7-1, extending the time for Freddie Mac to file a reply in support of its  
14 Motion for Summary Judgment (the “MSJ”) filed by Freddie Mac on January 17, 2017 [ECF No. 26]  
15 and joined by Wells Fargo on January 20, 2017 [ECF No. 29]. The reply in support of the MSJ is  
16 currently due on May 5, 2017. The Parties have agreed to extend this response date to May 26, 2017.

17 The extension is being sought in good faith and will not unduly delay this litigation.  
18 Collegium Fund filed its opposition to the MSJ on April 18, 2017 under seal. The opposition is  
19 roughly 30 pages and raises a number of issues. Freddie Mac is in need of additional time to review  
20 and respond to the opposition filed by Collegium Fund. Given the volume of litigation related to the  
21 HOA foreclosures and the issues raised by the opposition, the standard two week reply deadline will  
22 not offer sufficient time for a Freddie Mac to present its reply. The requested extension will give  
23 Freddie Mac three weeks additional weeks to prepare the reply, which is commensurate with the  
24 extensions the Parties agreed to for the oppositions to the MSJ.

25 Accordingly, the Parties respectfully request that the Court grant this Stipulation and extend  
26 the time to file a reply in support of the MSJ from May 5, 2017 to May 26, 2017.

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DATED this 24<sup>th</sup> day of April, 2017.

CONNAGHAN|NEWBERRY

SNELL & WILMER L.L.P.

/s/Tara Clark Newberry (with permission)

/s/ Nathan G. Kanute

Paul R. Connaghan, Esq.  
Nevada Bar No. 3229  
Tara Clark Newberry, Esq.  
Nevada Bar No. 10696  
7854 W. Sahara Avenue  
Las Vegas, NV 89117  
*Attorneys for Collegium #32*

Amy F. Sorenson, Esq. (NV Bar No. 12495)  
Nathan G. Kanute, Esq. (NV Bar No. 12413)  
50 W. Liberty Street, Suite 1510  
Reno, NV 89501-1961  
*Attorneys for Wells Fargo Bank, N.A. and  
Federal Home Loan Mortgage Corporation*

ABSOLUTE COLLECTION SERVICES, LLC

PENGILLY LAW FIRM


/s/ Shane D. Cox (with permission)

/s/ Elizabeth B. 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.**

  
\_\_\_\_\_  
HON. JAMES C. MAHAN  
UNITED STATES DISTRICT COURT JUDGE

DATED: April 26, 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 FILE REPLY IN SUPPORT OF**  
4 **FEDERAL HOME LOAN MORTGAGE CORPORATION'S MOTION FOR SUMMARY**  
5 **JUDGMENT** on the 24<sup>th</sup> day of April, 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.