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8 Attorneys for Defendant and Counterclaimant
 TROJAN CAPITAL INVESTMENTS, LLC and
 9 Defendant TRINITY FINANCIAL SERVICES,
 LLC

11 UNITED STATES DISTRICT COURT
 12 DISTRICT OF NEVADA

14 RODNEY MOTT,
 15 Plaintiff,
 16 v.
 17 THE PNC FINANCIAL SERVICES
 GROUP, INC; SELECT PORTFOLIO
 18 SERVICING, INC; TRINITY
 FINANCIAL SERVICES, LLC; TROJAN
 19 CAPITAL INVESTMENTS, LLC,
 RADIAN SERVICES, LLC; and SPECIAL
 20 DEFAULT SERVICES, INC.
 21 Defendants.

22 TROJAN CAPITAL INVESTMENTS,
 LLC,
 23 Counterclaimant,
 24 v.
 25 RODNEY MOTT; RADIAN SERVICES,
 26 LLC; PNC BANK, N.A.; THE PNC
 FINANCIAL SERVICES GROUP, INC.
 27 BANK OF AMERICA, N.A.; SELECT
 PORTFOLIO SERVICING, INC.;
 28 WILMINGTON TRUST, NATIONAL

Case No. 2:16-cv-01949-JCM-CWH
**STIPULATION FOR EXTENSION OF
 TIME TO FILE RESPONSE TO
 PLAINTIFF'S RE-URGED MOTION FOR
 PARTIAL SUMMARY JUDGMENT (DOC.
 84) AND TO FILE REPLY TO RESPONSE
 TO THE MOTION**
(First Request)

1 ASSOCIATION, not in its individual
2 capacity but solely as trustee under the
3 Greenwich Investors XL Pass-Through
4 Trust Agreement; DTA SOLUTIONS
5 LLC; BSI FINANCIAL SERVICES INC.;
6 DREAMBUILDER INVESTMENTS
7 LLC; LAND HOME FINANCIAL
8 SERVICES, INC.; TRINITY FINANCIAL
9 SERVICES, LLC; and Also all other
persons unknown claiming any right, title,
estate, lien or interest in the real property
described in the counterclaim adverse to
counterclaimant's ownership in the
referenced lien and note stated herein, or
any cloud upon counterclaimant's title to
the referenced lien and note herein
inclusive,

10 Counterdefendants.

11
12 Plaintiff Rodney Mott ("Mott"), Defendants Trojan Capital Investments, LLC ("Trojan"),
13 and Trinity Financial Services, LLC ("Trinity"), by and through their counsel of record request
14 the Court to extend the deadline for Trojan and Trinity to file their Response(s) to Mott's Motion
15 (Doc. 84), and to extend the deadline for Mott to file his Reply to the Response(s) of Trojan and
16 Trinity.¹ Trojan, Trinity, and Mott further state that:

17 1. On August 16, 2016, this action was initiated by Mott.

18 2. On December 9, 2017, the Court entered its Scheduling Order in this case, setting
19 dispositive motions for July 11, 2017. ECF Dkt. 30.

20 3. Mott filed his Re-Urged Motion for Partial Summary ("Motion") on June 26,
21 2017. The Responses of Trinity and Trojan are due July 17, 2017.

22 4. Trojan and Trinity request an extension of time in which they may file and serve
23 their Response(s) to the Motion to and including **July 31, 2017**.

24 5. In turn, Mott requests an extension of time in which to file and serve its Reply to
25 the Response(s) of Trojan and Trinity to the Motion to and including **August 25, 2017**.

26
27 ¹ Mott has moved to strike Trojan's Amended Answer and Counterclaims on grounds of untimeliness, ECF Dkt. and
28 does not concede that joinder of any entities made through Trojan's Amended Answer was appropriate. And
reference to Mott as a "counterdefendant," or identification of any other party as a "counterclaimant" or
"counterdefendant" is not a concession by Mott that such a term is appropriate.

1 6. Trojan, Trinity, and Mott are not intending their extensions to cause delay.

2 7. The extensions will allow Trojan and Trinity the time necessary to fully analyze
3 and brief the issues found in the Motion, and will allow Plaintiff Mott the time necessary to fully
4 analyze and brief the issues anticipated in the Response(s) to the Motion. The parties stipulate
5 that Trojan and Trinity’s response will not include any “countermotions” for summary judgment,
6 which the Parties agree would necessitate further briefing and cause further delay in the
7 prosecution of this case.

8 8. This is the parties’ first request for an extension of these deadlines.

9
10 IT IS SO STIPLATED:

11 Dated : July 13, 2017

Dated: June 13, 2017

12 KNEPPER & CLARK, LLP

BURKE, WILLIAMS & SORENSEN, LLP

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By: /s/ Richard J. Reynolds

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21 Attorneys for Plaintiff and
22 Counterdefendant
23 Rodney Mott

Attorneys for Defendant and
Counterclaimant
Trojan Capital Investments, LLC and
Defendant Trinity Financial Services, LLC

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1 Dated: June 13, 2017

Dated: June 13, 2017

2 BALLARD SPAHR, LLP

SCHWARTZ FLANSBURG, PLLC

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By: /s/ Frank M. Flansburg

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11 Attorneys for Counterdefendants
12 PNC Financial Services Group, Inc. and
13 PNC Bank, N.A.

10 Dated: June 13, 2017

Dated: June 13, 2017

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20 Attorneys for Counterdefendant
21 Bank of America, N.A.

Attorneys for Counterdefendants
Select Portfolio Servicing, Inc.

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Respectfully submitted by:
BURKE, WILLIAMS & SORESENSEN, LLP

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Attorneys for Defendant and
Counterclaimant TROJAN CAPITAL
INVESTMENTS, LLC and Defendant
TRINITY FINANCIAL SERVICES, LLC

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CERTIFICATE OF SERVICE

Pursuant to L.R., Part II, 5-4, I certify that I am an employee of BURKE, WILLIAMS & SORENSEN, LLP, and that on July 13, 2017, I caused to be served a true copy of the **STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFF'S RE-URGED MOTION FOR PARTIAL SUMMARY JUDGMENT (DOC. 84) AND TO FILE REPLY TO RESPONSE TO THE MOTION** addressed to all parties and counsel as identified on the Court-generated Notice of Electronic Filing; all counsel being registered to receive CM/ECF Electronic Filing as follows:

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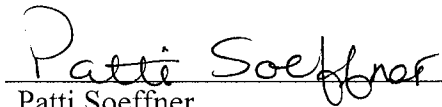
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