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7 *Attorneys for Defendant/Counter-Defendant*
 8 *The PNC Financial Services Group, Inc. and*
Counter-Defendant PNC Bank, N.A.

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

11 **RODNEY MOTT;**

12 **Plaintiff,**

13 **v.**

14 **THE PNC FINANCIAL SERVICES**
GROUP, INC.; SELECT PORTFOLIO
 15 **SERVICING, INC.; TRINITY FINANCIAL**
SERVICES, LLC; RADIANT SERVICES,
 16 **LLC; AND SPECIAL DEFAULT**
SERVICES, INC.;

17 **Defendants.**

CASE NO. 2:16-cv-01949-JCM-CWH

**JOINT MOTION AND ORDER TO
 EXTEND DEADLINE**

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1 TROJAN CAPITAL INVESTMENTS, LLC;

2
3 Counterclaimant(s)

4 v.

5 RODNEY MOTT; RADIAN SERVICES,
6 LLC; THE PNC FINANCIAL SERVICES
7 GROUP, INC.; BANK OF AMERICA, N.A.;
8 SELECT PORTFOLIO SERVICING, INC.;
9 WILMINGTON TRUST, NATIONAL
10 ASSOCIATION, not in its individual
11 capacity but solely as trustee under the
12 Greenwich Investors XL Pass-Through
13 Trust Agreement; DTA SOLUTIONS LLC;
14 BSI FINANCIAL SERVICES INC.;
15 DREAMBUILDER INVESTMENTS LLC;
16 LAND HOME FINANCIAL SERVICES,
17 LLC; and Also all other persons unknown
18 claiming any right, title, estate, lien or
19 interest in the real property described in
20 the counterclaim adverse to
21 counterclaimant's ownership in the
22 referenced lien and note stated herein, or
23 any cloud upon counterclaimant's title to
24 the referenced lien and note herein
25 inclusive;

26 Counter-defendant(s).

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Counter-Defendants PNC Financial Services Group, Inc. and PNC Bank, N.A. (collectively "PNC") and Counterclaimant Trojan Capital Investments, LLC ("Trojan")(collectively with PNC, the "Parties"), by and through their counsel of record¹, jointly move to extend the deadline for PNC to respond to Trojan's counterclaim (ECF No. 38). The parties state that:

¹ PNC Financial Services Group, Inc. ("PNC Financial") was named in the complaint, but was terminated from the case via a judgment entered on February 23, 2017 (ECF No. 37). Later, Trojan named PNC Financial in the counterclaim (EFC No. 38). Ballard Spahr, LLP now represents PNC Financial with respect to the counterclaim.

1 7. The extension will allow PNC to fully investigate Trojan's allegations in
2 the counterclaim so that PNC may appropriately respond thereto. The extension will
3 also accommodate PNC counsel's schedule and conflicts.

4 Dated: April 20, 2017

Dated: April 20, 2017

5 **BALLARD SPAHR LLP**

BURKE, WILLIAMS & SORENSEN, LLP

6
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*Attorneys for Counter-Defendants
PNC Financial Services Group, Inc
and PNC Bank, N.A.*

*Attorneys for Trojan Capital
Investments, LLC*

IT IS SO ORDERED.

DATED: April 21, 2017


C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

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20 Respectfully submitted by:

21 BALLARD SPAHR LLP

22 By: /s/ Holly Ann Priest
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CERTIFICATE OF SERVICE

Pursuant to Rule 5(b) of the Federal Rules of Civil Procedure, I HEREBY CERTIFY that on April 20, 2017, I served a true and correct copy of **JOINT MOTION AND ORDER TO EXTEND DEADLINE**, on the following parties by filing same with the Court's CM/ECF electronic filing system:

David H. Krieger Matthew I. Knepper Miles N. Clark HAINES & KRIEGER, LLC 8985 S. Eastern Avenue, Suite 350 Henderson, NV 89123 <i>Attorneys for Plaintiff/Counter-Defendant Rodney Mott</i>	Dana Jonathon Nitz Michael S. Kelley WRIGHT, FINLAY & ZAK, LLP 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorneys for Defendant/Counter-Defendant Select Portfolio Servicing, Inc.</i>
Michael R. Brooks BROOKS HUBLEY, LLP 1645 Village Center Circle, Suite 200 Las Vegas, NV 89134 <i>Attorney for Defendants Trinity Financial Services, LLC and Defendant/Counter-Claimant Trojan Capital Investments, LLC</i>	Richard J. Reynolds BURKE, WILLIAMS & SORENSEN, LLP 1851 East First Street, Suite 1550 Santa Ana, CA 92705 <i>Attorney for Defendant Trinity Financial Services, LLC; Special Default Services, Inc.; and Defendant/Counter-Claimant Trojan Capital Investments, LLC</i>
Kurt R. Bonds Stephen A. Fogdall Trevor Waite SCHNADER HARRISON SEGAL & LEWIS LLP 1600 Market Street, Suite 3600 Philadelphia, PA 19103 <i>Attorneys for Cross-Defendant/Counter-Defendant Radian Services, LLC</i>	

/s/ C. Wells
An employee of BALLARD SPAHR LLP