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8 *Attorneys for Wells Fargo Bank, N.A.*  
 9

10 **IN THE UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 ARGO NEVADA, LLC, a Nevada limited  
 13 liability company,

14 Plaintiff,

15 vs.

16 QUALITY LOAN SERVICE  
 CORPORATION, a foreign corporation  
 17 doing business in Nevada; WELLS  
 FARGO BANK, NA; DOES 1-5, inclusive;  
 18 and ROE Business Entities 6-10, inclusive,

19 Defendants.

Case No. 2:16-cv-02212-RFB-VCF

**STIPULATION AND ORDER FOR  
 DISMISSAL WITH PREJUDICE**

20  
 21 Pursuant to Fed. R. Civ. P. 41(a)(2), it is hereby stipulated and agreed between Argo  
 22 Nevada, LLC ("Plaintiff"), Wells Fargo Bank, N.A. ("Wells Fargo"), and Quality Loan Service  
 23 Corporation ("Quality Loan") (collectively, the "Parties") by and through their respective  
 24 counsel, that:

- 25 1. An order shall be entered dismissing this action, and each and all of the claims and  
 26 causes of action asserted herein, with prejudice;  
 27 2. All outstanding hearings and deadlines shall be vacated;

- 1 3. The Parties shall bear their own attorneys' fees and costs associated with this
- 2 action;
- 3 4. All lis pendens recorded by Plaintiff against the real property located at 6001
- 4 Shining Light Avenue, Las Vegas, Nevada 89139, APN 176-12-415-063 (the
- 5 "Property"), including, but not limited to, the Notice of Lis Pendens recorded on or
- 6 about July 12, 2016 as Document No. 20160712-0001620, shall be cancelled and
- 7 expunged of record;
- 8 5. Plaintiff is prohibited from recording any additional lis pendens or similar
- 9 instruments against the Property; and
- 10 6. The bond shall be released to the Law Offices of Mont E. Tanner.


11 DATED this 13<sup>th</sup> day of December 2017.

DATED this \_\_\_\_ day of December 2017.

12 SNELL & WILMER L.L.P.

LAW OFFICES OF MONT E. TANNER

13 By:

14   
 15 Amy F. Sorenson (NV Bar No. 12495)  
 16 Robin E. Perkins (NV Bar No. 9891)  
 17 Jennifer L. McBee (NV Bar No. 9110)  
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13 By:

14 Mont E. Tanner (NV Bar No. 4433)  
 15 2950 East Flamingo Road, Suite G  
 16 Las Vegas, NV 89121  
 Telephone: (702) 369-9614  
 Facsimile: (702) 369-5731  
 17 *Attorney for Plaintiff Argo Nevada, LLC*

18 *Attorneys for Defendant Wells Fargo Bank,*  
19 *N.A.*

20 DATED this \_\_\_\_ day of December 2017.

21 MCCARTHY AND HOLTHUS

22 By:

23 Thomas N. Beckom (NV Bar No. 12554)  
 24 9510 West Sahara, Suite 200  
 Las Vegas, NV 89117  
 Telephone: (702) 685-0329  
 Facsimile: (702) 339-5691

25 *Attorneys for Defendant Quality Loan*  
26 *Service Corporation*

- 1           3.     The Parties shall bear their own attorneys' fees and costs associated with this
- 2                     action;
- 3           4.     All lis pendens recorded by Plaintiff against the real property located at 6001
- 4                     Shining Light Avenue, Las Vegas, Nevada 89139, APN 176-12-415-063 (the
- 5                     "Property"), including, but not limited to, the Notice of Lis Pendens recorded on or
- 6                     about July 12, 2016 as Document No. 20160712-0001620, shall be cancelled and
- 7                     expunged of record;
- 8           5.     Plaintiff is prohibited from recording any additional lis pendens or similar
- 9                     instruments against the Property; and
- 10          6.     The bond shall be released to the Law Offices of Mont E. Tanner.

11           DATED this \_\_\_\_ day of December 2017.

                  DATED this 12 day of December 2017.

12           SNELL & WILMER L.L.P.

                  LAW OFFICES OF MONT E. TANNER

13           By: \_\_\_\_\_

14                     Amy F. Sorenson (NV Bar No. 12495)

15                     Robin E. Perkins (NV Bar No. 9891)

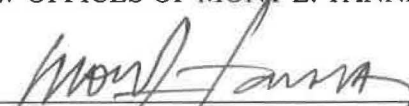
16                     Jennifer L. McBee (NV Bar No. 9110)

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*Attorney for Plaintiff Argo Nevada, LLC*

18                     *Attorneys for Defendant Wells Fargo Bank, N.A.*

19           DATED this \_\_\_\_ day of December 2017.

20           MCCARTHY AND HOLTHUS

21           By: \_\_\_\_\_

22                     Thomas N. Beckom (NV Bar No. 12554)

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24                     Las Vegas, NV 89117

                          Telephone: (702) 685-0329

                          Facsimile: (702) 339-5691

25                     *Attorneys for Defendant Quality Loan Service Corporation*

- 1           3.     The Parties shall bear their own attorneys' fees and costs associated with this
- 2                     action;
- 3           4.     All lis pendens recorded by Plaintiff against the real property located at 6001
- 4                     Shining Light Avenue, Las Vegas, Nevada 89139, APN 176-12-415-063 (the
- 5                     "Property"), including, but not limited to, the Notice of Lis Pendens recorded on or
- 6                     about July 12, 2016 as Document No. 20160712-0001620, shall be cancelled and
- 7                     expunged of record;
- 8           5.     Plaintiff is prohibited from recording any additional lis pendens or similar
- 9                     instruments against the Property; and
- 10          6.     The bond shall be released to the Law Offices of Mont E. Tanner.

11           DATED this \_\_\_\_ day of December 2017.                     DATED this \_\_\_\_ day of December 2017.  
 12           SNELL & WILMER L.L.P.                                     LAW OFFICES OF MONT E. TANNER

13           By: \_\_\_\_\_   By: \_\_\_\_\_  
 14                     Amy F. Sorenson (NV Bar No. 12495)                     Mont E. Tanner (NV Bar No. 4433)  
 15                     Robin E. Perkins (NV Bar No. 9891)                     2950 East Flamingo Road, Suite G  
 16                     Jennifer L. McBee (NV Bar No. 9110)                     Las Vegas, NV 89121  
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                            Telephone: (702) 784-5200   Attorney for Plaintiff Argo Nevada, LLC  
                            Facsimile: (702) 784-5252

18                     Attorneys for Defendant Wells Fargo Bank,  
 19                     N.A.

20           DATED this   12   day of December 2017.

21           MCCARTHY AND HOLTHUS

22           By:  \_\_\_\_\_  
 23                     Thomas N. Beckom (NV Bar No. 12554)  
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                            Facsimile: (702) 339-5691

26                     Attorneys for Defendant Quality Loan  
 27                     Service Corporation

**ORDER**

For good cause appearing,

**IT IS HEREBY ORDERED** that this action, and each and all of the claims and causes of action asserted herein, be **DISMISSED WITH PREJUDICE**, with each party to bear their own attorney's fees and costs;

**IT IS FURTHER ORDERED** that all hearings and deadlines be **VACATED**;

**IT IS FURTHER ORDERED** that all lis pendens recorded by Plaintiff against the real property located at 6001 Shining Light Avenue, Las Vegas, Nevada 89139, APN 176-12-415-063 (the "Property"), including, but not limited to, the Notice of Lis Pendens recorded on or about July 12, 2016 as Document No. 20160712-0001620, shall be cancelled and expunged of record;

**IT IS FURTHER ORDERED** that Plaintiff is prohibited from recording any additional lis pendens or similar instruments against the Property; and

**IT IS FURTHER ORDERED** that the bond shall be released to the Law Offices of Mont E. Tanner.


**IT IS SO ORDERED.**

DATED this 16th day of January, 2018.

  
\_\_\_\_\_  
RICHARD F. BOULWARE, II  
United States District Judge

Respectfully submitted,

SNELL & WILMER L.L.P.

By:   
\_\_\_\_\_  
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*Attorneys for Defendant Wells Fargo Bank, N.A.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2018, I electronically filed the foregoing **STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 10<sup>th</sup> day of January 2018.

  
\_\_\_\_\_  
An Employee of Snell & Wilmer L.L.P.

**Snell & Wilmer**

LLP  
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