

1 BRANDON E. WOOD  
Nevada State Bar Number 12900  
2 NEVADA ASSOCIATION SERVICES, INC.  
6625 S. Valley View Blvd. Suite 300  
3 Las Vegas, NV 89118  
Telephone: (702) 804-8885  
4 Facsimile: (702) 804-8887  
5 Email: brandon@nas-inc.com  
6 *Attorney for Defendant Nevada Association  
Services, Inc.*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 THE BANK OF NEW YORK MELLON FKA  
THE BANK OF NEW YORK AS TRUSTEE  
12 FOR THE REGISTERED HOLDERS OF  
THE CWABS, INC., ASSET-BACKED  
13 CERTIFICATES, SERIES 2005-13,

14 Plaintiff,

15 vs.

16 NORTHGATE HOMEOWNERS  
ASSOCIATION; NEVADA ASSOCIATION  
17 SERVICES, INC.; MARIA LOYO-  
MORALES; KIMBERLY TIBONI; DOES 1-  
18 10, inclusive,

19 Defendant.

20 MARIA LOYO-MORALES, an individual,

21 Counter-Claimant,

22 vs.

23  
24 THE BANK OF NEW YORK MELLON FKA  
THE BANK OF NEW YORK AS TRUSTEE  
25 FOR THE REGISTERED HOLDERS OF  
THE CWABS, INC., ASSET-BACKED  
26 CERTIFICATES, SERIES 2005-13,

27 Counter-Defendant.  
28

CASE NO.: 2:16-cv-02400-MMD-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME FOR NEVADA  
ASSOCIATION SERVICES, INC. TO  
FILE A RESPONSIVE PLEADING TO  
DEFENDANT MARIA LOYO-MORALES'  
ANSWER TO COMPLAINT [ECF NO. 1],  
COUNTERCLAIM AND CROSSCLAIM**

**(First Request)**

1 MARIA LOYO-MORALES, an individual,  
2 Cross-Claimant,

3 vs.

4 NORTHGATE HOMEOWNERS  
5 ASSOCIATION; NEVADA ASSOCIATION  
6 SERVICES, INC.; KIMBERLY TIBONI, an  
7 individual,  
8 Cross-Defendants.

9 **STIPULATION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

10 (First Request)

11 The parties respectfully submit the following Stipulation to allow Defendant NEVADA  
12 ASSOCIATION SERVICES, INC. (hereinafter "Defendant") thirty (30) additional days to file a  
13 responsive pleading to Cross-Claimant's (hereinafter "Cross-Claimant"), Complaint filed on  
14 July 26, 2022 [ECF No. 100].

15 Defendant has tendered defense to Northgate Homeowners Association and is awaiting the  
16 response. Pursuant to Stipulation of the parties, Defendant shall have until Friday,  
17 September 23, 2022, to file a responsive pleading.

18 This is the parties' first request for an extension. This request is not made to cause delay or  
19 prejudice to any party.

20 DATED this 23<sup>rd</sup> day of August, 2022.

21 **NEVADA ASSOCIATION SERVICES, INC.**

22 **CORY READE DOWS AND SHAFER**

23 By: 

24 BRANDON E. WOOD  
25 Nevada State Bar Number 12900  
26 6625 S. Valley View Blvd., Suite 300  
27 Las Vegas, Nevada 89118  
28 *Attorney for Defendant Nevada  
Association Services, Inc.*

By: /s/R. Christopher Reade

R. CHRISTOPHER READE  
Nevada State Bar Number 06791  
1333 North Buffalo Drive, Suite 210  
Las Vegas, Nevada 89128  
*Attorney for Maria Loyo-Morales*

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**AKERMAN, LLP**

/s/Scott R. Lachman  
By: **ARIEL E. STERN**  
Nevada State Bar No. 08276  
**NATALIE WINSLOW**  
Nevada State Bar No. 12125  
**SCOTT R. LACHMAN**  
Nevada State Bar No. 12016  
1635 Village Center Circle, Suite 200  
Las Vegas, Nevada 89134  
*Attorneys for The Bank of New York  
Mellon*

**ORDER OF EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

IT IS HEREBY ORDERED that the response to the Complaint is due on or before  
September 23, 2022.

**IT IS SO ORDERED.**



**UNITED STATES ~~DISTRICT~~ JUDGE**  
Case No. 2:16-cv-02400-MMD-VCF  
MAGISTRATE

**DATED:** 8-25-2022

## Susan Moses

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**From:** Chris Reade <creade@crdslaw.com>  
**Sent:** Monday, August 22, 2022 1:56 PM  
**To:** Susan Moses; scott.lachman@akerman.com  
**Cc:** Brandon Wood  
**Subject:** RE: The Bank of New York Mellon v. Northgate Homeowners Association, et al., Case No. 2:16-cv-02400-MMD-VCF

You may add my electronic signature.



**CORY READE DOWS & SHAFER**  
ATTORNEYS AT LAW

R. Christopher Reade, Esq.  
CORY READE DOWS & SHAFER  
1333 North Buffalo Drive, Suite 210  
Las Vegas, Nevada 89128  
(702) 794-4411  
Fax: (702) 794-4421

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**From:** Susan Moses <susanm@nas-inc.com>  
**Sent:** Monday, August 22, 2022 1:54 PM  
**To:** Chris Reade <creade@crdslaw.com>; scott.lachman@akerman.com  
**Cc:** Brandon Wood <brandon@nas-inc.com>  
**Subject:** The Bank of New York Mellon v. Northgate Homeowners Association, et al., Case No. 2:16-cv-02400-MMD-VCF

Good afternoon:

Enclosed please find Stipulation and Order to Extend time for Nevada Association Services, Inc. to file a Responsive Pleading to Defendant Maria Loyo-Morales' Answer to Complaint [ECF No. 1], Counterclaim and Crossclaim for your review. Let me know if you have any questions, changes or if I am authorized to use your e-signature. The Response is currently due on August 24, 2022. We would like to get this on file as soon as possible. Thank you and have a great rest of the day.

**Susan E. Moses**

Paralegal and Custodian of Records

Nevada Association Services, Inc.

6625 South Valley View Blvd.

Suite 300

Las Vegas, Nevada 89118

[www.nas-inc.com](http://www.nas-inc.com)

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*Our office hours are Monday – Thursday 9-5, Friday 9-4:30 and closed for lunch from 12-1 daily. There is a drop-box available for payments in front of our office during normal business hours and lunch.*



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## Susan Moses

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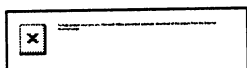
**From:** scott.lachman@akerman.com  
**Sent:** Monday, August 22, 2022 1:56 PM  
**To:** Susan Moses; create@crdslaw.com  
**Cc:** Brandon Wood; natalie.winslow@akerman.com; brianne.siriwan@akerman.com  
**Subject:** RE: The Bank of New York Mellon v. Northgate Homeowners Association, et al., Case No. 2:16-cv-02400-MMD-VCF  
**Attachments:** SAO to Extend Time to Respond\_First Request\_2 16-cv-02400.pdf

Brandon/Susan – Okay to use my e-signature on the stipulation. Re Tiboni

### Scott Lachman

Partner, Consumer Financial Services, Data and Technology (CFS+) Practice Group  
Akerman LLP | 1635 Village Center Circle, Suite 200 | Las Vegas, NV 89134  
D: 702 634 5021 | C: 702 321 7282  
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**From:** Susan Moses <susanm@nas-inc.com>  
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**To:** Chris Reade <create@crdslaw.com>; Lachman, Scott (Ptrn-Las) <scott.lachman@akerman.com>  
**Cc:** Brandon Wood <brandon@nas-inc.com>  
**Subject:** The Bank of New York Mellon v. Northgate Homeowners Association, et al., Case No. 2:16-cv-02400-MMD-VCF

**[External to Akerman]**

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