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10 *Attorneys for Plaintiff, Wells Fargo Bank National Association, as Trustee for the Holders of the*
 11 *First Franklin Mortgage Loan Trust 2006-FF15 Mortgage Pass-Through Certificates, Series*
 12 *2006-FF15*

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 WELLS FARGO BANK NATIONAL
 16 ASSOCIATION, AS TRUSTEE FOR THE
 17 HOLDERS OF THE FIRST FRANKLING
 18 MORTGAGE LOAN TRUST 2006-FF15
 19 MORTGAGE PASS-THROUGH
 20 CERTIFICATES, SERIES 2006-FF15,

21 Plaintiff,

22 vs.

23 RICARDO FOJAS, an individual;
 24 FERDINAND VASQUEZ, an individual;;
 25 HIDDEN CANYON OWNERS
 26 ASSOCIATION, a domestic corporation,

27 Defendants.

28 **Case No.:** 2:16-cv-02449-GMN-NJK

**STIPULATED REQUEST TO EXTEND
 TIME TO SUBMIT DISMISSAL PAPERS**

29 COMES NOW, Plaintiff, Wells Fargo Bank National Association, as Trustee for the
 30 Holders of the First Franklin Mortgage Loan Trust 2006-FF15 Mortgage Pass-Through
 31 Certificates, Series 2006-FF15 (hereinafter "Wells Fargo"), Hidden Canyon Owners Association
 32 ("HOA"), by and through respective counsel of record, and Defendants, Ricardo Fojas and
 33 Ferdinand Vasquez, (hereinafter "Defendants"); (collectively, the "Parties"), and hereby submit
 34 their Stipulated Request to Extend Time To Submit Dismissal Papers (the "Stipulation").

1 **WHEREAS** On January 5, 2018, Wells Fargo filed a Notice of Settlement in this matter.
2 [Docket No. 62].
3

4 **WHEREAS** On January 17, 2018, this Court issued a minute order, requiring the parties
5 submit their dismissal papers by February 5, 2018. [Docket No. 63].

6 **WHEREAS** On February 2, 2018, the Parties jointly filed a Joint Settlement Status
7 Report with the Court, explaining that the Parties were diligently working on the provisions of
8 the global settlement agreement and requested sixty (60) additional days to complete and execute
9 the settlement agreement prior to submitting its dismissal papers. [Docket No. 65].
10

11 **WHEREAS** On February 5, 2018, the Court issued an Order extending the deadline to
12 file dismissal papers to March 7, 2018. [Docket No. 66].

13 **WHEREAS** The Parties can now report to the Court that the settlement agreement has
14 been finalized by counsel for all parties. It has been executed by Plaintiff, Plaintiff's counsel,
15 Defendant Ricardo Fojas, Defendant Ferdinand Vasquez and agreed to by HOA's counsel and is
16 awaiting signature by HOA.
17

18 **THEREFORE IT IS HEREBY STIPULATED AND JOINTLY REQUESTED** that
19 the Parties hereby request an additional forty-five (45) days to complete all signatures, exchange
20 all settlement monies pursuant to the settlement agreement and file dismissal papers.
21

22 **I. Signatures Pursuant to LR 26-3**

23 This stipulation is signed in accordance with FRCP 26(g)(1) and LR 26-3. Each signature
24 constitutes a certification that, to the best of the signer's knowledge, information, and belief,
25 formed after a reasonable inquiry, the disclosures made by the signer are complete and correct as
26

27 //

28 //

1 of this time.

2 DATED this 7th day of March, 2018.

DATED this 7th day of March, 2018.

3 **WRIGHT, FINLAY & ZAK, LLP**

RICARDO FOJAS

4 /s/ Robert A. Riether, Esq.

/s/ Ricardo Fojas (with permission)

5 Robert A. Riether, Esq.

Ricardo Fojas

6 Nevada Bar No. 12076

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8 Las Vegas, Nevada 89117

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9 *Attorneys for Plaintiff, Wells Fargo Bank*

Defendant

10 *National Association, as Trustee for the*

11 *Holder of the First Franklin Mortgage Loan*

12 *Trust 2006-FF15 Mortgage Pass-Through*

13 *Certificates, Series 2006-FF15*

14 DATED this 7th day of March, 2018.

15 **FERDINAND VASQUEZ**

16 /s/ Ferdinand Vasquez (with permission)

17 Ferdinand Vasquez

18 7940 Quail Heaven Street

19 Las Vegas, NV 89131

20 *Defendant*

21 DATED this 7th day of March, 2018

22 **PENGILLY LAW FIRM**

23 /s/ Elizabeth Lowell, Esq. (With permission)

24 Elizabeth B. Lowell, Esq.

25 Nevada Bar No. 8551

26 1995 Village Center Circle, Suite 190

27 Las Vegas, NV 89134

28 *Attorneys for Hidden Canyon Homeowners*

Association

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: March 7, 2018