

1 GENTILE CRISTALLI  
2 MILLER ARMENI SAVARESE  
3 JANIECE MARSHALL  
Nevada Bar No. 4686  
Email: [jmarshall@gcmaslaw.com](mailto:jmarshall@gcmaslaw.com)  
4 410 S. Rampart Blvd., Suite 420  
Las Vegas, Nevada 89145  
Tel: (702) 880-0000  
5 Fax: (702) 778-9709  
Attorneys for Premier One Holdings, Inc.  
6 and Mimi Ventures, LLC

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UNITED STATES DISTRICT COURT

9

DISTRICT OF NEVADA

10 DEUTSCHE BANK NATIONAL TRUST  
11 COMPANY, AS TRUSTEE FOR  
WASHINGTON MUTUAL MORTGAGE  
12 PASS-THROUGH CERTIFICATES SERIES  
2004-AR10,

13 Plaintiff,

14 v.

15 PREMIER ONE HOLDINGS, INC., a Nevada  
corporation; ANTHEM COUNTRY CLUB  
16 COMMUNITY ASSOCIATION, INC., a Nevada  
non-profit corporation; MIMI VENTURES,  
17 LLC, a Nevada limited liability company; ERIC  
M. CHEN, an individual,

18 Defendants.

19 CASE NO. 2:16-cv-02805-JCM-PAL

20 **STIPULATION TO EXTEND TIME FOR  
DEFENDANTS TO RESPOND TO  
AMENDED COMPLAINT**

21 **(FIRST REQUEST)**

22 IT IS HEREBY STIPULATED by and between Plaintiff Deutsche Bank National Trust  
23 Company, As Trustee For Washington Mutual Mortgage Pass-Through Certificates Series 2004-  
24 AR10 ("Plaintiff") and Defendants Premier One Holdings INC. ("Premier One") and Mimi  
25 Ventures, LLC ("Mimi Ventures") (collectively Premier One and Mimi Ventures are referred to  
as "Defendants"), by and through their respective attorneys of record, to extend the deadline for  
26 Defendants to file an Answer, or other responsive pleading to the Amended Complaint [Dkt 11],  
27 currently due February 13, 2017, for two weeks, up to and including, **February 27, 2017**.

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10 Collection River – Stipulation to Extend Time

1           Defendants require additional time to respond to the Amended Complaint because  
2 counsel was recently retained on February 3, 2017, and copies of the recorded documents  
3 referenced in the Amended Complaint are not readily available online but must be obtained  
4 through Clark County Recorder's Office. Counsel for Premier and Mimi Ventures is working  
5 diligently to obtain the necessary documents, but needs additional time to prepare response. The  
6 granting of this extension will not prejudice Plaintiff. Plaintiff's counsel has not been able to  
7 effectuate service on Defendant Chin and, therefore, has no objection to the extension.

8           IT IS HEREBY STIPULATED.

9           DATED this 14<sup>th</sup> day of February, 2017.

10           GENTILE CRISTALLI  
11           MILLER ARMENI SAVARESE

12           /s/ *Janiece Marshall*

13           JANIECE MARSHALL  
14           Nevada Bar No. 4686  
15           410 South Rampart Boulevard, Suite 420  
16           Las Vegas, Nevada 89145  
17           Attorney for Premier One Holdings, Inc.  
18           410 S. Rampart Blvd., Suite 420  
19           Las Vegas, Nevada 89145  
20           Tel: (702) 880-0000  
21           *Attorneys for Defendants Premier One*  
22           *Holdings, Inc. and Mimi Ventures, LLC*

10           DATED this 14<sup>th</sup> day of February, 2017.

11           BALLARD SPAHR LLP

12           /s/ *Sylvia Semper*

13           ABRAN E. VIGIL  
14           Nevada Bar No. 7548  
15           SYLVIA O. SEMPER  
16           Nevada Bar No. 12863  
17           100 North City Parkway, Suite 1750  
18           Las Vegas, NV 89106  
19           *Attorneys for Plaintiff*

20           The Court, having reviewed and considered the Stipulation of the parties, and good cause  
21 appearing therefore, HEREBY ORDERS that the deadline for Defendants to file an Answer to  
22 the Amended Complaint [Dkt 11], currently due February 13, 2017, shall be extended for two  
23 weeks, up to and including, **February 27, 2017**.

24           IT IS SO ORDERED.

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26             
27           UNITED STATES MAGISTRATE JUDGE

28           Dated: February 16, 2017