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 8 Mimi Ventures LLC, and Eric M. Chen

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

11 DEUTSCHE BANK NATIONAL TRUST  
 12 COMPANY, as trustee for Washington  
 Mutual Mortgage Pass-Through  
 13 Certificates Series 2004-AR10;

Case No.: 2:16-cv-02805-JCM-PAL

14 Plaintiff,

15 vs.

16 PREMIER ONE HOLDINGS, INC.;  
 17 ANTHEM COUNTRY CLUB  
 ASSOCIATION, INC. ; MIMI VENTURES  
 18 LLC ; ERIC M. CHEN;

19 Defendants,

20 AND ALL RELATED MATTERS.

21 **STIPULATION AND ORDER TO STAY DISCOVERY**

22 Defendants, Premier One Holdings, Inc. ("Premier"), Mimi Ventures, LLC  
 23 ("Mimi"), and Eric M. Chen ("Chen") by and through Sarah A. Morris, Esq. and  
 24 Timothy A. Wiseman, Esq. of the law firm Morris Law Center; Deutsche Bank National  
 25 Trust Company, As trustee for Washington Mutual Mortgage Pass-Through  
 26

1 Certificated Series 2004-AR10 (“Plaintiff”) by and through Sylvia O. Semper, Esq. of the  
2 law firm Ballard Spahr; Defendant, Anthem Country Association Club, Inc., by and  
3 through Julie Funai, Esq., of Lipson Neilson Cole Seltzer & Garin, P.C., hereby agree  
4 and stipulate as follows:

5 IT IS HEREBY AGREED AND STIPULATED, that the parties jointly request an  
6 Order staying all discovery for 90 days as the parties are conducting settlement  
7 discussions and hope to settle this case.

8 The parties have good cause for requesting the stay due to ongoing settlement  
9 negotiations. The parties believe a stay of the matter to be appropriate to conserve  
10 judicial resources. The parties have entered into the agreement in good faith and not for  
11 purposes of delay.

12 IT IS FURTHER AGREED AND STIPULATED that once the stay is lifted, any  
13 remaining parties will submit a renewed discovery schedule 30-days from the date the  
14 stay is lifted.

15 Dated: January 5, 2018

Dated: January 10, 2018

16 MORRIS LAW CENTER

BALLARD SPAHR LLP

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18  
19 By: /s/ Timothy A. Wiseman  
20 Sarah A. Morris, Esq.  
21 Nevada Bar No. 8461  
22 Timothy A. Wiseman, Esq.  
23 Nevada Bar No. 13786  
24 *Attorneys for Defendant, Premier One*  
25 *Holdings, Inc., Mimi Ventures LLC,*  
26 *and Eric M. Chen.*

By: /s/ Scott A. Wiseman  
Abran E. Vigil, Esq.  
Nevada Bar No. 7548  
Sylvia O. Semper, Esq.  
Nevada Bar No. 12863  
*Attorneys for Plaintiff*

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Dated: January 10, 2018

LIPSON NEILSON COLE SELTZER  
& GARIN, P.C.

By: /s/ Julie Funai

Julie Funai, Esq.  
Nevada Bar No. 8725  
9900 Covington Cross Drive, Suite  
120, Las Vegas, NV 89144  
*Attorneys for Anthem Country  
Association Club, Inc*

**ORDER**

**IT IS ORDERED** that this case is stayed for 90 days, or until **April 12, 2018**.  
**IT IS FURTHER ORDERED** that the parties shall have until **May 14, 2018**, to  
submit a renewed discovery schedule if the case has not settled.

Dated: February 8, 2017

  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted:

By: /s/ Timothy A. Wiseman

Timothy A. Wiseman  
Nevada Bar No. 13786  
*Attorneys for Defendant, Premier One  
Holdings, Inc., Mimi Ventures LLC,  
and Eric M. Chen.*

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO STAY DISCOVERY** by the method indicated:

\_\_\_\_\_ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).

\_\_\_\_\_ **BY E-MAIL:** by transmitting via e-mail the document(s) listed above to the email addresses set forth below and/or included on the Court's Service List for the above-referenced case.

\_\_\_\_\_ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

\_\_\_\_\_ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

\_\_\_\_\_ **BY PERSONAL DELIVERY:** by causing personal delivery via messenger service of the document(s) listed above to the person(s) at the address(es) set forth below.

  X   **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

and addressed to the following:

**Lipson Neilson Cole Seltzer & Garin, P.C.**  
Julie Funai jwhitmanfunai@lipsonneilson.com

**Ballard Spahr LLP**  
Sylvia O. Semper sempers@ballardspahr.com  
Joel Edward Tasca tasca@ballardspahr.com  
Abran A. Vigil vigila@ballardspahr.com

Dated this 9<sup>th</sup> day of January, 2018.



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An employee of Morris Law Center