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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FEDERAL NATIONAL MORTGAGE
ASSOCIATION;

Case No.: 2:16-cv-02829-JAD-PAL

Plaintiff,
vs.

**STIPULATION AND ORDER TO STAY
ALL LITIGATION DEADLINES FOR 90
DAYS**

WARM SPRINGS RESERVE OWNERS
ASSOCIATION; FERRELL STREET TRUST;
ALESSI & KOENIG, LLC;

(First Request)

Defendants.

Pursuant to Local Rule 6-2(a), plaintiff Federal National Mortgage Association (**Fannie Mae**) and defendant Warm Spring Reserve Owners Association (**Warm Springs**) stipulate to extend and stay the current litigation deadlines. As grounds therefore, the parties state as follows:

On December 29, 2016, Warm Springs moved to dismiss Fannie Mae's complaint on the grounds the complaint failed to state a claim. (ECF No. 8.) Fannie Mae's deadline to file a responsive pleading is January 12, 2017.

On December 13, 2016, defendant Alessi & Koenig, LLC (**Alessi**) filed a petition for Chapter 7 Bankruptcy in the United States Bankruptcy Court, District of Nevada. *See* Bankruptcy Petition No. 16-16593-abl.

The parties are working with the trustee of Alessi's bankruptcy case to determine how to proceed on cases involving Alessi, including the instant case.

The parties stipulate to stay all litigation deadlines, including Fannie Mae's responsive

1 deadline to Warm Springs' motion to dismiss, for 90 days to allow for the bankruptcy trustee to
2 provide direction on the prosecution of this case. Good cause exists to extend the litigation
3 deadlines, including Fannie Mae's deadline to respond to Warm Springs' motion to dismiss.

4 Accordingly, the parties stipulate and request the court stay the outstanding litigation
5 deadlines for 90 days, including extending Fannie Mae's deadline to respond to Warm Springs'
6 motion to dismiss to April 18, 2017.

7 DATED January 9, 2017.

<p>8 AKERMAN LLP</p> <p>9</p> <p>10 <u>/s/ Vatana Lay</u></p> <p>11 ARIEL E. STERN, ESQ.</p> <p>12 Nevada Bar No. 8276</p> <p>13 VATANA LAY, ESQ.</p> <p>14 Nevada Bar No. 12993</p> <p>15 1160 Town Center Drive, Suite 330</p> <p>16 Las Vegas, Nevada 89144</p> <p>17 <i>Attorneys for Plaintiff Federal National</i></p> <p>18 <i>Mortgage Association</i></p>	<p>8 LIPSON, NEILSON, COLE, SELTZER &</p> <p>9 GARIN, P.C.</p> <p>10 <u>/s/ J. William Ebert</u></p> <p>11 J. WILLIAM EBERT, ESQ.</p> <p>12 Nevada Bar No. 2697</p> <p>13 JULIE A. FUNAI, ESQ.</p> <p>14 Nevada Bar No. 8725</p> <p>15 9900 Covington Cross Drive, Suite 120</p> <p>16 Las Vegas, Nevada 89144</p> <p>17 <i>Attorney for Defendant Warm Springs Reserve</i></p> <p>18 <i>Owners Association</i></p>
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19 **ORDER**

20 IT IS SO ORDERED:

21 
22 UNITED STATES DISTRICT COURT JUDGE
23 Dated: January 10 2017.