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8 *Attorneys for OCWEN FINANCIAL CORP., MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., MERSCORP HOLDINGS INC.*

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

11 SALMA AGHA-KHAN, MD., an individual,

Case No.: 2:16-cv-02928-APG-PAL

12 Plaintiff,

13 vs.

**MOTION TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

14 WELLS FARGO BANK, NA, A US Bank;  
15 WELLS FARGO FINANCIAL NATIONAL  
16 BANK, A National Banking Association;  
17 WELLS FARGO HOME MORTGAGE, a  
18 Wells Fargo Bank, NA subsidiary;  
19 MORTGAGE ELECTRONIC  
20 REGISTRATION SYSTEMS, INC., a  
21 Delaware agency/corporation, form unknown;  
22 MERSCORP HOLDINGS INC., holding/parent  
23 company of MERS Inc.; TBI MORTGAGE  
24 COMPANY, a mortgage company; GMAC  
25 MORTGAGE, LLC FKA GMAC  
26 MORTGAGE CORPORATION, a financial  
27 lending business; OCWEN FINANCIAL  
28 CORPORATION, a financial concern, form  
unknown; MARIN CONVEYANCING CORP  
AKA MARIN CONVEYANCING  
CORPORATION, a lending corporation form  
unknown; EXECUTIVE TRUSTEE  
SERVICES, LLC, a defunct Delaware company  
form unknown; FIRST AMERICAN TITLE  
COMPANY, a title agency form unknown;  
FIRST AMERICAN TITLE INSURANCE  
COMPANY, a title insurance company form  
unknown; ROUTH CRABTREE OLSEN PS, a  
law firm in California; EDWARD T. WEBER,  
an individual and attorney at Routh Crabtree  
Olsen PS; BRET P. RYAN, an individual and  
attorney at Rough Crabtree Olsen PS;

1 JOHNATHAN J. DAMEN, an Individual and  
2 attorney at Routh Crabtree Olden PS; JEFF  
3 ROMIŠ AKA JEFFREY L. ROMIG, an  
4 individual; PATRICIA J. KRAUSE, an  
5 individual; GREENPOINT MORTGAGE  
6 FUNDING, INC., a mortgage company form  
7 unknown; SERVICELINK AKA  
8 SERVICELINK, LLC a business organization  
9 form unknown; LSI TITLE AGENCY INC., a  
10 title agency form unknown; CHICAGO TITLE  
11 COMPANY, a title company form unknown;  
12 FIDELITY NATIONAL DEFAULT  
13 SOLUTIONS, INC., a company form  
14 unknown; NATIONWIDE TITLE CLEARING,  
15 a title company form unknown; AMANDA  
16 ROSE JONES, an individual and Assistant  
17 Secretary for MERS Inc., KRISTOPHER  
18 JAMES SANDBERG, a Wells Fargo employee;  
19 and DOES 1 THROUGH 1000, INCLUSIVE,

20 Defendants.

21 Pursuant to Federal Rule of Civil Procedure 6(b), Defendants, OCWEN FINANCIAL CORP.,  
22 MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., MERSCORP HOLDINGS INC.  
23 hereby request an order granting additional time, up to and including March 1, 2017, to file a responsive  
24 pleading to Plaintiff's pro per 75 page, 236 paragraph Complaint. This is the first request for an extension  
25 of this deadline.

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1 This Motion is based upon the attached points and authorities, the pleadings and papers on file  
2 herein and any argument of counsel that may be considered at the hearing on this Motion by the Court.

3 DATED this 27<sup>th</sup> day of January, 2017.

4 WRIGHT, FINLAY & ZAK, LLP

5  
6 /s/ Yanxiong Li, Esq.  
7 Dana Jonathon Nitz, Esq.  
8 Nevada Bar No. 0050  
9 Natalie C. Lehman, Esq.  
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11 YanXiong Li, Esq.  
12 Nevada Bar No. 12807  
13 7785 W. Sahara Avenue, Suite 200  
14 Las Vegas, Nevada 89117  
15 *Attorneys for OCWEN FINANCIAL CORP.,*  
16 *MORTGAGE ELECTRONIC*  
17 *REGISTRATION SYSTEMS, INC.,*  
18 *MERSCORP HOLDINGS INC.*

19 **POINTS AND AUTHORITIES**

20 Plaintiff commenced this lawsuit on December 16, 2016, by filing his pro per Complaint (ECF  
21 No. 1). The Complaint spans 75 pages, asserts 16 causes of action, and includes 236 separate factual  
22 allegations that require individual response. The Complaint identifies as defendants: Ocwen Financial  
23 Corp. ("Ocwen"), Mortgage Electronic Registration Systems, Inc. ("MERS"), MERSCorp Holdings Inc.  
24 ("Merscorp"), among the 26 separate individual and entity defendants named.

25 Defendant Ocwen was served with the Complaint on January 11, 2017, making its deadline to  
26 respond to the Complaint February 1, 2017. It is currently unclear when or even if all the other  
27 defendants have been served. Defendant Ocwen first retained counsel on January 24, 2017 and will  
28 defend on behalf of all named defendants pursuant to its pre-existing agreements with the various  
defendants. By this Motion, all named Defendants jointly request an extension of time to respond up to  
and including March 1, 2017. This request is being made pursuant to F.R.C.P. 6(b)(1)(A) as the time  
period to respond to the Complaint has not yet passed for any of the Defendants.

1 Good cause exists to extend the time to respond to the pro per Complaint because of the length of  
2 the 75 page pleading, the complexity presented in its 16 causes of action, and the investigation and  
3 research necessary to respond to the separate 236 paragraphs of allegations. The requested time is needed  
4 to investigate the facts and analyze the applicable law in order to prepare a response. Moreover, multiple  
5 defendants will need to review and approve the response before it can be filed. Defendants submit that  
6 the additional time requested is reasonable, particularly in light of the above listed factors.  
7

8 **CONCLUSION**


9 For these reasons, Defendants respectfully request an extension of the time to respond to  
10 Plaintiffs' Complaint until March 1, 2017.

11 DATED this 27<sup>th</sup> day of January, 2017.

12  
13 WRIGHT, FINLAY & ZAK, LLP

14  
15 /s/ Yanxiong Li, Esq.  
16 Dana Jonathon Nitz, Esq.  
17 Nevada Bar No. 0050  
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24 *Attorneys for OCWEN FINANCIAL CORP.,  
25 MORTGAGE ELECTRONIC REGISTRATION  
26 SYSTEMS, INC., MERSCORP HOLDINGS INC.*

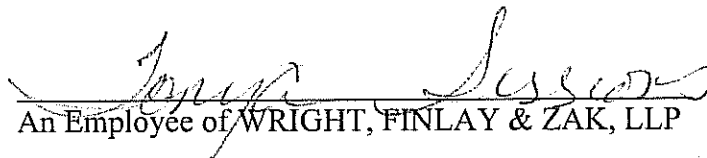
27 IT IS SO ORDERED this 2nd day  
28 of February, 2017.

29   
30 Peggy A. Leen  
31 United States Magistrate Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I electronically served the foregoing **MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT** was made on the 27<sup>th</sup> day of January, 2017, to all parties and counsel as identified on the Court-generated Notice of Electronic Filing and/or by depositing a true and correct copy of the same in the U.S. Mail addressed as follows:

Salma Agha-Khan, M.D.  
3751 Motor Ave., #34272  
Las Angeles, CA 90034

  
An Employee of WRIGHT, FINLAY & ZAK, LLP