

**THE BALL LAW GROUP**  
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10 *Credit Union, Jeffrey L. Romig and*  
11 *Patricia Romig (formally known as*  
12 *Patricia Krause)*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 SALMA AGHA-KHAN, MD., an individual  
12  
13 Plaintiff,

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

13 vs.

**MOTION TO EXTEND TIME TO  
RESPOND TO COUNTERCLAIM**

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  
22 unknown; MERSCORP HOLDINGS INC,  
23 holding/parent company of MERS Inc.; TBI  
24 MORTGAGE COMPANY, a mortgage  
25 company; GMAC MORTGAGE, LLC FKA  
26 GMAC MORTGAGE CORPORATION, a  
27 financial lending business; OCWEN  
28 FINANCIAL CORPORATION, a financial  
concern, form unknown; MARTIN  
CONVEYANCING CORP AKA MARTIN  
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; BRETT P. RYAN, an

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individual and attorney at Routh Crabtree Olsen, PS; JOHNATHAN J. DAMEN, an individual and attorney at Routh Crabtree Olsen, PS; JEFF ROMIG AKA JEFFREY L. ROMIG, an individual; PATRICIA J. KRAUSE, an individual; GREENPOINT MORTGAGE FUNDING, INC, a mortgage company form unknown; SERVICELINK AKA SERVICELINK, LLC a business organization form unknown; LSI TITLE AGENCY INC, a title agency form unknown; CHICAGO TITLE COMPANY, a title company form unknown; FIDELITY NATIONAL DEFAULT SOLUTIONS INC, a company form unknown; NATIONWIDE TITLE CLEARING, a title company form unknown, AMANDA ROSE JONES, an individual and Assistant Secretary for MERS Inc; KRISTOPHER JAMES SANBERG, a Wells Fargo employee; AND DOES 1 THROUGH 1000 INCLUSIVE,

Defendants.

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant-Intervenor NAVY FEDERAL CREDIT UNION (“Navy Federal”), by and through its attorney, Zachary T. Ball, Esq. of Ball Law Group, hereby requests an Order granting additional time, up to June 1, 2017 (10 days from the date of this Motion) to file a responsive pleading to Plaintiff/Counterclaimant SALMA AGHA-KHAN, M.D.’S (“Plaintiff/Counterclaimant”) Counterclaim to NAVY FEDERAL’S Complaint in Intervention [Document #82].

DATED this 22<sup>nd</sup> day of May, 2017.

THE BALL LAW GROUP  

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/s/ Zachary T. Ball, Esq.  
Zachary T. Ball, Esq., NBN 8364  
3455 Cliff Shadows Pkwy., Suite 150  
Las Vegas, Nevada 89129  
Attorney for *Navy Federal  
Credit Union, Jeffrey L. Romig and  
Patricia Romig (formally known as  
Patricia Krause)*

**POINTS AND AUTHORITIES**

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2 Plaintiff/Counterclaimant’s initial Complaint was filed on December 16, 2016, by filing  
3 his *in proper person* Complaint [Document #1] which spans 75 pages, asserts 16 causes of  
4 action, and includes 236 separate factual allegations that require individual responses.

5 Navy Federal, the moving party, filed a Complaint in Intervention to which Plaintiff/  
6 Counterclaimant answered and filed a Counterclaim against Nevada Federal on or about May  
7 1, 2017 [Document #82]. This document contains an Answer to Navy Federal’s Complaint in  
8 Intervention as well as a Counterclaim, the latter of which is 23 pages long (not including  
9 exhibits, the Answer, and the declaration of Plaintiff/Counterclaim, which bring the total  
10 length of the pleading to 68 pages). It multiple causes of action and contains 93 paragraphs  
11 which require individual responses.

12 It is this pleading (i.e. Plaintiff/Counterclaimant’s Counterclaim against Nevada Federal  
13 [Document #82]) which is at issue in this Motion. A responsive pleading to said Counterclaim  
14 is due on the date of this filing (May 22, 2017). By way of this Motion, Navy Federal seeks a  
15 brief 10-day extension (which, by Navy Federal’s calculation, is June 1, 2017) to file said  
16 responsive pleading. This request is made pursuant to F.R.C.P. 6(b)(1)(A) as Navy Federal’s  
17 time period to respond to the Counterclaim has not yet passed.

18 Good cause exists to extend the time to respond to the Counterclaim because the length  
19 of the 68-page pleading (including exhibits), the complexity presented in the causes of action  
20 and the 93 paragraphs of factual allegations and prayers for relief, and the investigation and  
21 research that will be necessary to respond to all. The requested time is needed to investigate  
22 the facts and analyze the applicable law in order to prepare an appropriate response.

23 Moreover, it is unlikely Plaintiff/Counterclaimant will be prejudiced in any way by the  
24 minimal amount of time (10 days) Navy Federal is requesting to respond. This is a very short  
25 amount of time and will not impact the matter in any way.

**CONCLUSION**

For these reasons, Navy Federal respectfully requests an extension of time to respond to Plaintiff/Counterclaimant’s Counterclaim until June 1, 2017.

DATED this 22<sup>nd</sup> day of May, 2017.

THE BALL LAW GROUP

**IT IS SO ORDERED** this 30th day of May, 2017.

/s/ Zachary T. Ball, Esq.

Zachary T. Ball, Esq., NBN 8364  
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Attorney for Navy Federal  
Credit Union, Jeffrey L. Romig and  
Patricia Romig (formally known as  
Patricia Krause)

  
Peggy A. Leen  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

The undersigned employee of THE BALL LAW GROUP hereby certifies that the foregoing **MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT** was electronically filed with the United States District Court on the 22<sup>nd</sup> day of May, 2017. Service of the foregoing document was made 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 to the addresses shown below and by U.S. Mail, with first class postage prepaid there in a sealed envelope addressed to the following:

Salma Agha-Khan  
3751 Motor Ave #34272  
Los Angeles, CA 90034  
*Pro Se*

/s/ Zachary T. Ball, Esq.

An Employee of the Ball Law Group

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