

1 MELANIE D. MORGAN, ESQ.
2 Nevada Bar No. 8215
3 VATANA LAY, ESQ.
4 Nevada Bar No. 12993
5 AKERMAN LLP
6 1635 Village Center Circle, Suite 200
7 Las Vegas, NV 89134
8 Telephone: (702) 634-5000
9 Facsimile: (702) 380-8572
10 Email: melanie.morgan@akerman.com
11 vatana.lay@akerman.com

12 Attorneys for Plaintiffs Bayview Loan
13 Servicing, LLC and Federal Home Loan
14 Mortgage Corporation

15 **IN THE UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 BAYVIEW LOAN SERVICING, LLC; and
18 FEDERAL HOME LOAN MORTGAGE
19 CORPORATION,

20 Plaintiff,

21 vs.

22 WASHINGTON & SANDHILL
23 HOMEOWNERS ASSOCIATION; ABSOLUTE
24 COLLECTION SERVICES, LLC; SILVER
25 STREAM ADVISORS, LLC; and NEW
DIRECTION IRA, INC. FBO MARIO TINLIN,
IRA,

26 Defendants.

27 Case No.: 2:17-cv-00026-GMN-CWH

28 **STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

29 Pursuant to LR IA 6-1 and LR 26-4, Bayview Loan Servicing, LLC (**Bayview**) and Federal
30 Home Loan Mortgage Corporation (**Fannie Mae**), Washington & Sandhill Homeowners Association
31 (**Washington**), Absolute Collection Services, LLC (**ACS**), and Silver Stream Advisors, LLC (**Silver**
32 **Stream**) by and through their undersigned counsel of record, hereby submit the following
33 Stipulation and [Proposed] Order to Extend Discovery Deadlines. This is the first stipulation for
34 extension of the subject discovery deadlines submitted by the parties.

35 **A. Discovery Completed.**

36 The following discovery has been completed thus far:

1 **1. Initial Disclosures:** On September 14, 2017, Plaintiffs served their initial disclosures. On
2 December 7, 2017 Washington served its initial disclosures.

3 **2. Expert Disclosures:** The deadline for expert disclosures has not yet passed.

4 **3. Written Discovery:** On January 23, 2018, BANA served respective requests for
5 admission, interrogatories, and requests for production of documents on Silver Stream, ACS and
6 Washington.

7 **4. Depositions:** No depositions have taken place.

8 **B. Discovery Remaining.**

9 The parties anticipate engaging in additional discovery, including but not limited to:

10 **1. Depositions:** On January 24, 2018, BANA served an amended notices to take the
11 deposition of the FRCP 30(b)(6) representative of Washington on March 20, 2018. The parties
12 anticipate taking the depositions of Silver Stream and ACS's Fed R. Civ. P. 30(b)(6) witnesses.

13 **2. Washington's Discovery:** Washington anticipates it will disclose its expert
14 designations, take depositions of Plaintiffs, and serve its written discovery requests on Plaintiffs, in
15 the event the parties are unable to settle this matter within the next 30 days.

16 **C. Reasons Why Discovery Not Completed.**

17 The parties are working diligently to settle this matter and request additional time for
18 settlement discussions without expending the time and expenses in conducting discovery. The
19 parties submit this stipulation in good faith, without the purpose of undue delay, and respectively
20 request that the Court extend the pending discovery deadlines by thirty (30) days pursuant the
21 proposed schedule listed below.

22 **D. Proposed Schedule.**

23 1. Discovery Cut-Off: May 14, 2018.
24 2. Disclosure of Expert: March 14, 2018
25 3. Rebuttal Expert: April 13, 2018
26 4. Interim Status Report: March 14, 2018
27 5. Dispositive Motions: June 13, 2018

28 ///

1 6. Pre-Trial Order: July 13, 2018

2 3 DATED this 12th day of February, 2018

4 4 **AKERMAN LLP**

5
6 /s/ Vatana Lay
7 MELANIE MORGAN, ESQ.
8 Nevada Bar No. 8215
9 VATANA LAY, ESQ.
10 Nevada Bar No. 12993
11 1635 Village Center Circle, Suite 200
12 Las Vegas, Nevada 89134

13 10 Attorneys for Plaintiffs

14 12 DATED this 12th day of February, 2018

15 13 **ABSOLUTE COLLECTION SERVICES, LLC**

16 15 /s/ Shane D. Cox
17 16 SHANE D. COX, ESQ.
18 17 Nevada Bar No. 13852
19 18 8440 W. Lake Mead Blvd., Suite 210
20 19 Las Vegas, Nevada 89128

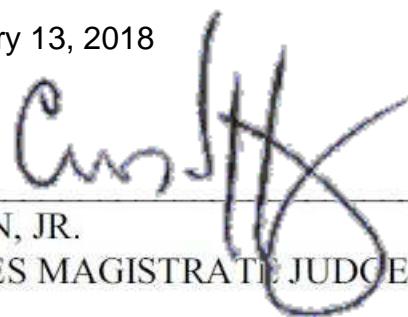
21 20 Attorneys for Absolute Collection Services, LLC

22 21

23 22

24 23 IT IS SO ORDERED.

25 24 DATED: February 13, 2018

26 25
27 26 
28 27 C.W. HOFFMAN, JR.
29 28 UNITED STATES MAGISTRATE JUDGE