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7 Attorneys for Plaintiffs Bayview Loan  
 Servicing, LLC and Federal Home Loan  
 8 Mortgage Corporation

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

11 BAYVIEW LOAN SERVICING, LLC; and  
 12 FEDERAL HOME LOAN MORTGAGE  
 CORPORATION,

13 Plaintiff,

14 vs.

15 WASHINGTON & SANDHILL  
 16 HOMEOWNERS ASSOCIATION; ABSOLUTE  
 COLLECTION SERVICES, LLC; SILVER  
 17 STREAM ADVISORS, LLC; and NEW  
 DIRECTION IRA, INC. FBO MARIJO TINLIN,  
 18 IRA,

19 Defendants.

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

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

**AKERMAN LLP**

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

26 **A. Discovery Completed.**

27 The following discovery has been completed thus far:

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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

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6. Pre-Trial Order: July 13, 2018

DATED this 12th day of February, 2018

**AKERMAN LLP**

/s/ Vatana Lay  
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Attorneys for Plaintiffs

DATED this 12th day of February, 2018

**GORDON REES SCULLY MANSUKHANI, LLP**

/s/ Wing Yan Wong  
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Attorney for Washington & Sandhill HOA

DATED this 12th day of February, 2018

**ABSOLUTE COLLECTION SERVICES, LLC**

/s/ Shane D. Cox  
SHANE D. COX, ESQ.  
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Attorneys for Absolute Collection Services, LLC

DATED this 12th day of February, 2018

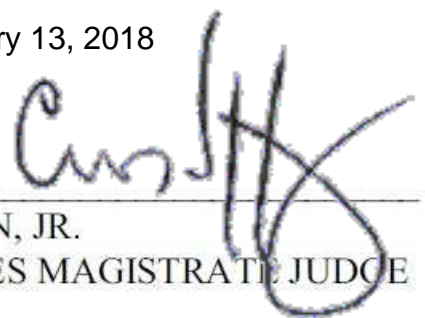
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Attorney for Silver Stream Advisors, LLC

IT IS SO ORDERED.

DATED: February 13, 2018

  
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C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE