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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 JPMORGAN CHASE BANK, N.A., a
14 national banking association,

15 Plaintiff,

16 vs.

17 SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company; THE
18 WILLOWS HOMEOWNERS'
ASSOCIATION, a Nevada non-profit
19 corporation; DANIEL A. RICHARD, an
individual,

20 Defendants.

21 SFR INVESTMENTS POOL 1, LLC, a
22 Nevada limited liability company,

23 Counterclaimant/Cross-Claimant,

24 vs.

25 JPMORGAN CHASE BANK, N.A.;
26 DANIEL A. RICHARD, an individual,

27 Counter-Defendant/Cross-Defendants.
28

Case No. 2:17-CV-00324-GMN-PAL

**STIPULATION AND ORDER TO 1)
DISMISS CLAIMS BETWEEN
JPMORGAN CHASE BANK, N.A.,
WILLOWS HOMEOWNERS'
ASSOCIATION, AND SFR
INVESTMENTS POOL 1, LLC WITH
PREJUDICE; AND 2) LIFT STAY
ENTERED MARCH 20, 2018**

1 Pursuant to Local Rules LR IA 6-2 and LR 26-4, Plaintiff/Counter-Defendant
2 JPMorgan Chase Bank, N.A. (“Chase”), Defendant/Counterclaimant/Cross-Claimant
3 SFR Investments Pool 1, LLC (“SFR”) and Defendant The Willows Homeowners’
4 Association (“The Willows”), through their respective attorneys, stipulate as follows:

5 1. This action concerns title to real property commonly known as 701
6 Taliput Palm Place in Henderson, Nevada (“Property”) following a homeowner’s
7 association foreclosure sale conducted on May 14, 2013, with respect to the Property.

8 2. As it relates to the Parties, a dispute arose regarding that certain Deed
9 of Trust recorded against the Property in the Official Records of Clark County, Nevada
10 as Instrument Number 20071130-0001688 (“Deed of Trust”), and in particular,
11 whether the Deed of Trust continues to encumber the Property.

12 3. The Parties to this Stipulation have settled and agreed to release their
13 respective claims, and further agreed that the claims between them, including the
14 Complaint and Counterclaim, shall be DISMISSED with prejudice.

15 4. This Stipulation in no way affects SFR’s Cross-claim against Daniel A.
16 Richard (the “former unit owner”).

17 5. The Parties further stipulate and agree that the \$500 in security costs
18 posted by Chase on June 23, 2017 pursuant to this Court’s Order [ECF No. 19] shall
19 be discharged and released to the Ballard Spahr LLP Trust Account.

20 6. The Parties further stipulate and agree that the three Lis Pendens
21 recorded against the Property in the Official Records of Clark County, Nevada, as
22 Instruments Number 20131206-0000049 and 20170331-0002804, 20170807-0001658
23 be, and the same hereby are, EXPUNGED.

24 7. The Parties further stipulate and agree that a copy of this Stipulation and
25 Order may be recorded with the Clark County Recorder.

26 8. The Parties further agree to lift the stay entered March 20, 2018 [ECF
27 No. 57];

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