

Snell & Wilmer
LLP
LAW OFFICES
50 West Liberty Street, Suite 510
Reno, Nevada 89501
775.785.5440

1 Erica J. Stutman, Esq.
2 Nevada Bar No. 10794
3 Tanya N. Lewis, Esq.
4 Nevada Bar No. 8855
5 SNELL & WILMER L.L.P.
6 3883 Howard Hughes Parkway Suite 1100
7 Las Vegas, Nevada 89169
8 Telephone: 702.784.5200
9 Facsimile: 702.784.5252
10 Email: estutman@swlaw.com
11 tlewis@swlaw.com
12 *Attorneys for Plaintiff*
13 *Deutsche Bank National Trust Company, as Trustee for*
14 *Fremont Home Loan Trust Series 2006-3*

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

12 DEUTSCHE BANK NATIONAL TRUST
13 COMPANY, as Trustee for Fremont Home
14 Loan Trust Series 2006-3,

14 Plaintiff,

15 vs.

16 LV REAL ESTATE STRATEGIC
17 INVESTMENT GROUP LLC, a Nevada
18 limited-liability company; LV REAL ESTATE
19 STRATEGIC INVESTMENT GROUP LLC
20 SERIES 9128, a Nevada limited-liability
21 company; TERRA WEST COLLECTIONS
22 GROUP LLC d/b/a ASSESSMENT
23 MANAGEMENT SERVICES, a Nevada
24 limited liability company; and TAPESTRY AT
25 TOWN CENTER HOMEOWNERS
26 ASSOCIATION, a Nevada nonprofit
27 corporation;

23 Defendants.

Case No. 2:17-cv-00605-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF
DEUTSCHE BANK NATIONAL TRUST
COMPANY’S TIME TO RESPOND TO
DEFENDANT TERRA WEST/AMS’S
MOTION TO DISMISS**

FIRST REQUEST

24 It is hereby stipulated by and between Plaintiff Deutsche Bank National Trust
25 (“Plaintiff”), through its attorneys, Snell & Wilmer, L.L.P., and Defendant Terra West/AMS
26 (“Terra West”), through its attorneys, the law firm of Richard Vilkin, P.C., as follows:

27 Terra West filed its Motion to Dismiss on May 19, 2017 [Docket No. 22]. Plaintiff was
28 served on May 19, 2017, and its response is due on or about June 5, 2017. In the interest of

1 conserving client and judicial resources, Plaintiff requests, and Terra West agrees, that Plaintiff
2 shall have until **June 19, 2017**, to file its Opposition. Terra West will then have two weeks and
3 two days, or to **July 5, 2017**, to file its Reply.

4
5 Dated June 2, 2017

6 LAW OFFICES OF RICHARD VILKIN, PC

Snell & Wilmer L.L.P.

7 By: /s/ Richard Vilkin

By: /s/ Tanya N. Lewis

8 Richard Vilkin, Esq.

Erica J. Stutman, Esq.

9 LAW OFFICE OF RICHARD VILKIN, PC

Nevada Bar No. 10794

10 1286 Crimson Sage Ave.

Tanya N. Lewis, Esq.

11 Henderson, NV 89012

Nevada Bar No. 8855

12 *(signed with permission)*

3883 Howard Hughes Parkway, Suite 1100

13 *Attorneys for Defendant*

Las Vegas, NV 89169

14 *Terra West/AMS*

Attorneys for Plaintiff

Deutsche Bank National Trust Company

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

IT IS ORDERED THAT Plaintiff's time to respond to Terra West's Motion to Dismiss shall be extended to on or before June 19, 2017. Terra West's Reply shall be due on July 5, 2017.

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Judge

DATED this 5th day of June, 2017.

Respectfully submitted by:

SNELL & WILMER L.L.P.

/s/ Tanya N. Lewis
Tanya N. Lewis, Esq.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200

*Attorneys for Plaintiff
Deutsche Bank National Trust Company,
as Trustee for Fremont Home Loan Trust Series 2006-3*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

On June 2, 2017, I served the foregoing document on all parties appearing in this case when filing said document through the court’s PACER system with automatic e-service on all persons who have registered for e-service on PACER for this case.

/s/ Nissa Riley
An Employee of Snell & Wilmer L.L.P.

4813-1990-0489.1