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7 *Attorneys for First 100, LLC and Jay Bloom*

8 **UNITED STATES DISTRICT COURT**
 9 **DISTRICT OF NEVADA**

11 THE BANK OF NEW YORK MELLON FKA
 12 THE BANK OF NEW YORK, AS TRUSTEE
 13 FOR THE CERTIFICATEHOLDERS OF
 14 CWALT, INC., ALTERNATIVE LOAN TRUST
 2005-56, MORTGAGE PASSTHROUGH
 15 CERTIFICATES, SERIES 2005-56

16 Plaintiff,

17 vs.

18 CHRISTOPHER COMMUNITIES AT
 SOUTHERN HIGHLANDS GOLF CLUB
 19 HOMEOWNERS ASSOCIATION; KUPPERLIN
 LAW GROUP, LLC; FIRST 100, LLC; ALAN
 20 LAHRS AND THERESA LARHS AS
 TRUSTEES OF THE LAHRS FAMILY TRUST;
 21 DOE INDIVIDUALS 1-X, inclusive; and ROE
 22 CORPORATIONS I-X, inclusive,

23 Defendants.

24 CHRISTOPHER COMMUNITIES AT
 SOUTHERN HIGHLANDS GOLF CLUB
 25 HOMEOWNERS ASSOCIATION,

26 Cross-Claimant,

27 vs.
28

Case No.: 2:17-cv-01033-JCM-GWF

**STIPULATION AND REQUEST TO
 EXTEND TIME FOR FIRST 100, LLC
 AND JAY BLOOM TO FILE A RESPONSE
 TO ALAN LAHRS AND THERESA
 LAHRS, AS TRUSTEES OF THE LAHRS
 FAMILY TRUST’S CROSS-CLAIM
 AGAINST FIRST 100, LLC AND THIRD-
 PARTY COMPLAINT AGAINST JAY
 BLOOM (ECF No. 75)**

(Second Request)

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KUPPERLIN LAW GROUP, LLC, Cross-defendant
KUPPERLIN LAW GROUP, LLC Counter-Claimant vs. NATALIE L. WINSLOW, an individual, Counter-defendant.
ALAN LAHRS AND THERESA LAHRS AS TRUSTEES OF THE LAHRS FAMILY TRUST, a trust established under the laws of the State of Nevada, Cross-Claimant vs. CHRISTOPHER COMMUNITIES AT SOUTHERN HIGHLANDS GOLF CLUB HOMEOWNERS ASSOCIATION, A HOMEOWNER'S ASSOCIATION GOVERNED BY THE LAWS OF THE STATE OF NEVADA; KUPPERLIN LAW GROUP, LLC, a Nevada limited liability company; FIRST 100, LLC, a Nevada limited liability company, Cross-Defendants.

1 ALAN LAHRS AND THERESA LAHRS AS
2 TRUSTEES OF THE LAHRS FAMILY
3 TRUST, a trust established under the laws of the
4 State of Nevada,
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6 Third-Party Plaintiff,
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8 vs.
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10 JAY BLOOM, an individual, DOE
11 INDIVIDUALS I-X inclusive; and ROE
12 CORPORATIONS I-X, inclusive,
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14 Third-Party Defendants.
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16 Cross-Defendant FIRST 100, LLC (“First 100”) and Third-Party Defendant JAY BLOOM
17 (“Bloom”), by and through their attorneys, the law firm of MAIER GUTIERREZ & ASSOCIATES, and
18 Alan Lahrs and Theresa Lahrs as Trustees of the Lahrs Family Trust (“Lahrs Parties”), by and through
19 their attorneys, HUTCHISON & STEFFEN, PLLC and JEFFREY R. ALBREGTS, LLC, hereby STIPULATE
20 AND AGREE that First 100 and Bloom’s deadline to file a response to Alan Lahrs and Theresa Lahrs
21 as Trustees of the Lahrs Family Trust’s Answer to Complaint, Cross Claims, and Third-Party
22 Complaint (ECF No. 75) should be extended from January 4, 2019 to and including **Monday,**
23 **February 4, 2019.**

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1 This extension is requested as a result of the Lahrs Parties filing their supplemental third party
2 Complaint on December 17, 2018. In an effort to prevent multiple filings, First 100 and Bloom wish
3 to file only one responsive pleading, which incorporates a response to the supplemental third party
4 Complaint. As such, First 100 and Bloom are respectfully requesting a brief 30-day extension to
5 provide their response. This brief extension will not unduly delay this matter in any way.

6 DATED this 31st day of December, 2018.

DATED this 31st day of December, 2018.

7 **MAIER GUTIERREZ & ASSOCIATES**

HUTCHISON & STEFFEN, PLLC

8
9 /s/ Danielle J. Barraza

/s/ Todd W. Prall

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16 *Attorneys for Plaintiff/Counter-Defendant
17 Panda LLC Series 2052 Houdini Street*

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25 *Attorneys for Defendants Alan Lahrs and
26 Theresa Lahrs as Trustees of the Lahrs
27 Family Trust*

15 DATED this 31st day of December, 2018.

16 **JEFFREY R. ALBREGTS, LLC**

17 /s/ Jeffrey R. Albregts

18 JEFFREY R. ALBREGTS, ESQ.
19 Nevada Bar No. 66
20 701 Shadow Lane, Suite 150
21 Las Vegas, Nevada 89106
22 *Attorneys for Third-Party Complainants
23 Alan Lahrs and Theresa Lahrs as Trustees
24 of the Lahrs Family Trust*

23 IT IS SO ORDERED.

24 DATED January 2, 2019.

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27 UNITED STATES MAGISTRATE JUDGE