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9 Attorneys for Defendants  
 10 COMMONWEALTH LAND TITLE INSURANCE  
 11 COMPANY and LAWYERS TITLE OF NEVADA, INC.

12 UNITED STATES DISTRICT COURT  
 13 DISTRICT OF NEVADA

14 THE BANK OF NEW YORK MELLON  
 15 FKA THE BANK OF NEW YORK, AS  
 16 TRUSTEE FOR THE  
 17 CERTIFICATEHOLDERS OF CWALT,  
 18 INC., ALTERNATIVE LOAN TRUST  
 19 2005-56, MORTGAGE PASS-THROUGH  
 20 CERTIFICATES, SERIES 2005-56,  
 21 Plaintiff,

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

**STIPULATION AND ~~PROPOSED~~  
 ORDER EXTENDING DEFENDANTS  
 COMMONWEALTH LAND TITLE  
 INSURANCE COMPANY AND  
 LAWYER'S TITLE OF NEVADA,  
 INC.'S TIME TO RESPOND TO  
 COMPLAINT (ECF NO. 114)**

22 vs.

**(First Request)**

23 CHRISTOPHER COMMUNITIES AT  
 24 SOUTHERN HIGHLANDS GOLF CLUB  
 25 HOMEOWNERS ASSOCIATION;  
 26 KUPPERLIN LAW GROUP, LLC; FIRST  
 27 100, LLC; ALAN LAHRS AND  
 28 THERESA LAHRS AS TRUSTEES OF  
 THE LAHRS FAMILY TRUST; DOE  
 INDIVIDUALS 1-X, inclusive; and ROE  
 CORPORATIONS 1-X, inclusive,  
 Defendant.

CHRISTOPHER COMMUNITIES AT  
 SOUTHERN HIGHLANDS GOLF CLUB  
 HOMEOWNERS ASSOCIATION,  
 Cross-Claimant,

vs.

KUPPERLIN LAW GROUP, LLC,  
 Cross-Defendant.



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KUPPERLIN LAW GROUP, LLC,  
  
Counter-Claimant,  
  
vs.  
  
NATALIE L. WINSLOW, an individual,  
  
Counter-Defendant.

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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.

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ALAN LAHRS AND THERESA LAHRS  
AS TRUSTEES OF THE LAHRS FAMILY  
TRUST, a trust established under the laws  
of the State of Nevada,

Third-Party Plaintiff,

vs.

JAY BLOOM, an individual, DOE  
INDIVIDUALS I-X, inclusive; and ROE  
CORPORATIONS I-X, inclusive,

Third-Party Plaintiff.

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ALAN LAHRS AND THERESA LAHRS,  
individually and as TRUSTEES OF THE  
LAHRS FAMILY TRUST,

Third-Party Plaintiffs,

vs.

COMMONWEALTH LAND TITLE  
INSURANCE COMPANY, a Foreign

1 Corporation previously registered with the  
2 Nevada Secretary of State's Office,  
3 LAWYERS TITLE OF NEVADA, Inc., a  
4 Nevada Domestic Corporation; DOE  
5 individuals I-V; and ROE  
6 CORPORATIONS I-V,  
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8 \_\_\_\_\_ Supplemental Third-Party Defendants.

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10 **STIPULATION AND PROPOSED ORDER EXTENDING DEFENDANTS**  
11 **COMMONWEALTH LAND TITLE INSURANCE COMPANY AND LAWYER'S TITLE**  
12 **OF NEVADA, INC.'S TIME TO RESPOND TO COMPLAINT (ECF NO. 114)**

13 Third-Party Plaintiffs Alan Lahrs and Theresa Lahrs, individually and as Trustees for their  
14 Family Trust ("Plaintiffs"), and Defendants Commonwealth Land Title Insurance Company and  
15 Lawyers Title of Nevada, Inc. ("Defendants"), by and through their counsel of record, hereby  
16 stipulate as follows:

17 **WHEREAS**, Plaintiffs filed their Third-Party Complaint in this matter on December 17,  
18 2018 (ECF No. 114);

19 **WHEREAS**, Defendants were served with the Summons and Third-Party Complaint on or  
20 about December 28, 2018;

21 **WHEREAS**, Defendants' response to the Third-Party Complaint is due on January 18,  
22 2019;

23 **WHEREAS**, counsel for Defendants were only recently retained and require additional  
24 time to respond to the Third-Party Complaint;

25 **WHEREAS**, this is the first stipulation for an extension of Defendants' time to respond to  
26 the Third-Party Complaint; and

27 **WHEREAS**, Plaintiffs have agreed to extend Defendants' time to respond to the Third-  
28 Party Complaint to February 1, 2019,

Now, therefore, the parties hereto, by and through their counsel of record, and subject to  
Court approval, hereby stipulate and agree as follows:

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1. Defendants shall file their response to the Third-Party Complaint in this matter on or before February 1, 2019.

Dated this 16<sup>th</sup> day of January 2019

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

By: /s/ Sophia S. Lau  
Sophia S. Lau, Esq.  
Nevada Bar No. 13365  
601 South Seventh Street, 2<sup>nd</sup> Floor  
Las Vegas, Nevada 89101  
Attorneys for Defendants  
Commonwealth Land Title Insurance Company and  
Lawyers Title of Nevada, Inc.

Dated this 16<sup>th</sup> day of January 2019

JEFFREY R. ALBREGTS, LLC

By: /s/ Jeffrey R. Albregts  
Jeffrey R. Albregts, Esq.  
Nevada Bar No. 0066  
701 Shadow Lane, Suite 150  
Las Vegas, NV 89106  
Attorneys for Third-Party Plaintiffs  
Alan Lahrs and Theresa Lahrs, individually and as  
Trustees for their Family Trust

**ORDER**

**IT IS SO ORDERED:**

By: *George Foley Jr.*  
UNITED STATES MAGISTRATE JUDGE

Dated: 01-17-2019