

1 JOSEPH A. GUTIERREZ, ESQ.
 Nevada Bar No. 9046
 2 DANIELLE J. BARRAZA, ESQ.
 Nevada Bar No. 13822
 3 **MAIER GUTIERREZ & ASSOCIATES**
 8816 Spanish Ridge Avenue
 4 Las Vegas, Nevada 89148
 Telephone: (702) 629-7900
 5 Facsimile: (702) 629-7925
 E-mail: jag@mgalaw.com
 6 djb@mgalaw.com

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
 Plaintiff,
 16
 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,
 Defendants.
 23

24 CHRISTOPHER COMMUNITIES AT
 SOUTHERN HIGHLANDS GOLF CLUB
 25 HOMEOWNERS ASSOCIATION,
 Cross-Claimant,
 26
 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)**

(Third 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,

5 Third-Party Plaintiff,

6 vs.

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

10 Third-Party Defendants.

11 Cross-Defendant FIRST 100, LLC (“First 100”) and Third-Party Defendant JAY BLOOM
12 (“Bloom”), by and through their attorneys, the law firm of MAIER GUTIERREZ & ASSOCIATES, and
13 Alan Lahrs and Theresa Lahrs as Trustees of the Lahrs Family Trust (“Lahrs Parties”), by and through
14 their attorneys, HUTCHISON & STEFFEN, PLLC and JEFFREY R. ALBREGTS, LLC, hereby STIPULATE
15 AND AGREE that First 100 and Bloom’s deadline to file a response to Alan Lahrs and Theresa Lahrs
16 as Trustees of the Lahrs Family Trust’s Answer to Complaint, Cross Claims, and Third-Party
17 Complaint (ECF No. 75) should be extended from February 4, 2019 to and including **Monday,**
18 **March 1, 2019.**

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1 This extension is requested as a result of the procedural posture of this case and the mutual
2 desire of the parties to resolve the claims against First 100 and Bloom prior to First 100 and Bloom
3 responding to the Lahrs Parties' Complaint. In an effort to continue the productiveness of the
4 conversations between the parties, First 100 and Bloom and the Lahrs Parties are respectfully
5 requesting a brief 28-day extension to provide their response. This brief extension will not unduly
6 delay this matter in any way.

7 DATED this 1st day of February, 2019.

DATED this 1st day of February, 2019.

8 **MAIER GUTIERREZ & ASSOCIATES**

HUTCHISON & STEFFEN, PLLC

9 /s/ Danielle J. Barraza

/s/ Todd W. Prall

10 JOSEPH A. GUTIERREZ, ESQ.
11 Nevada Bar No. 9046
12 DANIELLE J. BARRAZA, ESQ.
13 Nevada Bar No. 13822
14 8816 Spanish Ridge Avenue
15 Las Vegas, Nevada 89148
16 *Attorneys for Plaintiff/Counter-Defendant*
17 *Panda LLC Series 2052 Houdini Street*

JOHN T. STEFFEN, ESQ.
Nevada Bar No. 4390
TODD W. PRALL, ESQ.
Nevada Bar No. 9154
Peccole Professional Park
10080 West Alta Drive, Suite 200
La Vegas, Nevada 89145
Attorneys for Defendants Alan Lahrs and
Theresa Lahrs as Trustees of the Lahrs
Family Trust

16 DATED this 1st day of February, 2019.

17 **JEFFREY R. ALBREGTS, LLC**

18 /s/ Jeffrey R. Albregts

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

24 IT IS SO ORDERED.

25 DATED February 4, 2019.

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28 UNITED STATES MAGISTRATE JUDGE