JEFFREY R. ALBREGTS, ESQ. 1 Nevada Bar No. 0066 701 Shadow Lane, Suite 150 2 Las Vegas, Nevada 89106 3 Tele.: 702/483-5026; Fax.: 702/485-2343 Email: jalbregts@albregtslaw.com 4 Attorneys for TPP Alan and Theresa Lahrs 5 6 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 THE BANK OF NEW YORK MELLON FKA 10 THE BANK OF NEW YORK, AS TRUSTEE FOR THE CERTIFICATEHOLDERS OF 11 CWALT, INC., ALTERNATIVE LOAN 12 TRUST 2005-56, MORTGAGE **PASSTHROUGH** 13 CERTIFICATES, SERIES 2005-56, 14 Plaintiff, 15 VS. 16 CHRISTOPHER COMMUNITIES AT 17 SOUTHERN HIGHLANDS GOLF CLUB HOMEOWNERS ASSOCIATION; 18 KUPPERLIN LAW GROUP, LLC; FIRST 100, LLC; ALAN LAHRS AND THERESA LAHRS 19 AS TRUSTEES OF THE LAHRS FAMILY 20 TRUST; DOE INDIVIDUALS I-X, inclusive; and ROE CORPORATIONS I-X, inclusive, 21 Defendants. 22 23 CHRISTOPHER COMMUNITIES AT SOUTHERN HIGLANDS GOLF CLUB HOA, 24 Cross-Claimant, 25 26 KUPPERLIN LAWGROUP, LLC, 27 Cross-Defendant.

CASE NO. 2:17-cv-01033-JCM-EJY

THIRD STIPULATION AND PROPOSED ORDER EXTENDING THIRD-PARTY PLAINTIFFS LAHRS' TIME TO FILE REPLY TO THIRD PARTY DEFENDANTS COMMONWEALTH LAND TITLE INSURANCE COMPANY'S AND LAWYERS TITLE OF NEVADA, INC'S FIRST AMENDED ANSWER AND COUNTERCLAIM [ECF 146]

THIRD STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWYERS TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 1

28

- 1		
1	CHRISTOPHER COMMUNITIES AT SOUTHERN HIGHLANDS GOLF CLUB HOA	
2		
3	Cross-Claimant, vs.	
4	KUPPERLIN LAW GROUP, LLC,	
5		
6	Cross-Defendant.	
7	KUPPERLIN LAW GROUP, LLC,	
8	Counter-Claimant,	
9	VS.	
10	NATALIE L. WINSLOW, an individual,	
11	Counter-Defendant.	
12	ALAN LAHRS AND THERESA LAHRS	
13	AS TRUSTEES OF THE LAHRS FAMILY	
14	TRUST, a trust established under the laws of the State of Nevada,	
15	Cross-Claimant,	
16	vs.	
17	CHRISTOPHER COMMUNITIES AT	
18	SOUTHERN HIGHLANDS GOLF CLUB HOA, a homeowner's association governed by	
19	the laws of the State of Nevada; KUPPERLIN	
20	LAW GROUP, LLC, a Nevada limited liability company; FIRST 100, LLC, a Nevada limited	
21	liability company,	
22	Cross-Defendants.	
23	ALAN LAHRS AND THERESA LAHRS	
24	AS TRUSTEES OF THE LAHRS FAMILY	
25	TRUST, a trust established under the laws of the State of Nevada,	
26	Third-Party Plaintiff,	
27	I mild I dity i idillizit,	
	1.7	

THIRD STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWYERS TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 2

28

vs.

VS.

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

Third-Party Defendants.

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

Third-Party Plaintiffs,

COMMONWEALTH LAND TITLE
INSURANCE COMPANY, a Foreign
Corporation previously registered with the
Nevada State Secretary of State's Office;
LAWYERS TITLE OF NEVADA, Inc., a
Nevada Domestic Corporation; DOE individuals
I-V; and ROE CORPORATIONS I-V,

Supplemental Third-Party Defendants.

## **THIRD**

## STIPULATION AND PROPOSED ORDER EXTENDING THIRD-PARTY PLAINTIFFS LAHRS' TIME TO FILE REPLY TO DEFENDANTS COMMONWEALTH LAND TITLE INSURANCE COMPANY AND LAWYERS TITLE OF NEVADA, INC FIRST AMENDED ANSWER AND COUNTERCLAIM

It is hereby Stipulated and Agreed by and between Jeffrey R. Albregts, Esq., counsel for Third-Party Plaintiffs, individually and as Trustees for their Family Trust ("Lahrs"); and Defendants Commonwealth Land Title Insurance Company and Lawyers Title of Nevada, Inc. ("Commonwealth"), by and through their counsel of record, Sophia S. Lau, Esq., and Christopher Ritter, Esq., that Lahrs' deadline to file a Reply to Commonwealth's and Lawyers Title of Nevada, Inc's First Amended Answer and Counterclaim [ECF 146] should be extended from September 2, 2019 to and including Monday, September 16, 2019.

THIRD STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWYERS TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 3

1	DATED this 28th day of August, 2019.	
2		JEFFREY R. ALBREGTS, LLC
3		/s/ Jeffrey R. Albregts
4		Jeffrey R. Albregts, Esq., NSB 0066
5		JEFFREY R. ALBREGTS, LLC 701 Shadow Lane, Suite 150
6		Las Vegas, Nevada 89106
7		Facsimile: 702/485-2343
8		Email: jalbregts@albregtslaw.com Attorneys for Third Party Plaintiffs Lahrs
9	DATED this 28th day of August, 2019.	
10		EARLY SULLIVAN WRIGHT GIZER & McRAE, LLP
12		/s/ Christopher I. Ritter
13		Sophia S. Lau, Esq., NSB 13365
14		8716 Spanish Ridge Avenue, Suite 105 Las Vegas, NV 89148
15		Telephone: 702/331-7593 Facsimile: 702/331-1652
16		
17		Christopher I. Ritter, Esq. Early Sullivan Wright Gizer & McRae,
18 19		LLP 6420 Wilshire Blvd, 17 <sup>th</sup> Floor
20		Los Angeles, CA 90048 Attorneys for Defendants Commonwealth
21		And Lawyers Title of Nevada, Inc.
22	IT IS SO ORDERED:	
23	Council 2 200 chal	
24	UNITED STATES MAGISTRATE JUDGE	August 29, 2019 Dated:
25		
26		
27		
28		
	THIRD STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWY TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM	YERS

## **CERTIFICATE OF SERVICE**

2 3 4 5	on this day of August, 2019, I cause STIPULATION AND PROPOSED OF FILE REPLY TO TPD COMMONWINC'S FIRST AMENDED ANSWER	o), I certify that on behalf of Jeffrey R. Albregts, LLC, ed the above and foregoing document entitled THIRD ORDER EXTENDING TPP LAHRS' TIME TO EALTH'S AND LAWYERS TITLE OF NEVADA, AND COUNTERCLAIM, to be served as follows:  I through court's electronic filing system, with the date
6 7		service substituted for the date and place of
8 9 10 11 12	Sean L. Anderson, Esq. J. Tyler King 2525 Box Canyon Drive Las Vegas, Nevada 89128 Attorneys for Christopher Communities at Southern Highlands Golf Club HOA Sanderson@lkglawfirm.com Tking@lkglawfirm.com	Robert E. Atkinson, Esq. Atkinson Law Associates, Ltd. 376 E. Warm Springs Road, Suite 130 Las Vegas, Nevada 89119 Attorney for Kupperlin Law Group, LLC Email: Robert@nv-lawfirm.com
114   14   15   15   16   17   17   18   19   19   19   19   19   19   19	Darren T. Brenner, Esq. Rex Garner, Esq. Akerman LLP 1160 Town Center Drive, Suite 330 Las Vegas, NV 89144 Attorneys for Plaintiff Email: Darren.brenner@akerman.com Email: Rex.garner@akerman.com Joseph Gutierrez, Esq. Daniel Barraza, Esq. Maier Gutierrez & Associates 8816 Spanish Ridge Ave.	John T. Steffan, Esq. Todd W. Prall, Esq. Hutchison & Steffen, PLLC 10080 West Alta Drive, Suite 200 Las Vegas, NV 89145 Attorneys for Lahrs/Lahrs Family Trust Email: Tprall@hutchlegal.com  Sophia S. Lau, Esq., NSB No. 13365 Early Sullivan Wright Gizer & McRae, LLP 8716 Spanish Ridge Avenue, Suite 105 Las Vegas, NV 89148 Email: Slau@earlysullivan.com
22 23 24 25 26 27	Las Vegas, NV 89148 Attorneys for Bloom & First 100, LLC Email: jag@mgalaw.com Email: djb@mgalaw.com	Christopher I. Ritter, Esq. Early Sullivan Wright Gizer & McRae, LLP 6420 Wilshire Blvd, 17th Floor Los Angeles, CA 90048 Email: <a href="mailto:critter@earlySullivan.com">critter@earlySullivan.com</a> Attorneys for Commonwealth/Lawyers Title /s/ Heather Stroup
28		For Jeffery Albregts, LLC

THIRD STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWYERS TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 5