



1 **MORRIS LAW CENTER**  
 SARAH A. MORRIS, ESQ.  
 2 Nevada Bar No. 8461  
 sarah@morrislawcenter.com  
 3 TIMOTHY A. WISEMAN, ESQ.  
 Nevada Bar No. 13786  
 4 tim@morrislawcenter.com  
 5 5450 W. Sahara Ave. Suite 330  
 Las Vegas, NV 89146  
 6 Telephone: (702) 850-7798  
 Facsimile: (702) 850-7998  
 7 *Attorneys for Defendant, ZHK Inc.*

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

10 ZHK INC., a Nevada corporation;

11 Plaintiff,

12 vs.

13 WILMINGTON TRUST, N.A.; KENNETH  
 14 DELMAR JONES JR FAMILY TRUST; DOES  
 1-100, INCLUSIVE, AND ROES 1-100,  
 15 INCLUSIVE.

16 Defendants.  
 17

Case No.: 2:17-cv-01078-JCM-VCF

**STIPULATION AND ORDER TO**  
**STAY DISCOVERY PENDING**  
**RESOLUTION OF MOTIONS**

18 Plaintiff, ZHK Inc., ("ZHK") by and through Sarah A. Morris, Esq. and Timothy  
 19 A. Wiseman, Esq. of the law firm Morris Law Center; Wilmington Trust, NA, Successor  
 20 Trustee to Citibank, N.A. As Trustee F/B/O Holders of Structured Asset Mortgage  
 21 Investments II, Inc., Bear Stearns Alt-A Trust 2006-6, Mortgage Pass-Through  
 22 Certificates Series 2006-6 ("Defendant") by and through Sylvia O. Semper, Esq. of the  
 23 law firm Ballard Spahr, hereby agree and stipulate as follows:<sup>1</sup>  
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26 <sup>1</sup> Kenneth Delmar Jones Jr Family Trust has not filed into this case.

1 IT IS HEREBY AGREED AND STIPULATED, that the parties jointly request an  
2 Order staying all discovery until the pending Motion to Remand, Motion to  
3 Consolidate, and Motion to Amend (Doc. 7, Doc. 8, Doc. 9, Doc. 10, Doc 11, Doc. 12, and  
4 Doc 17) are ruled upon.

5 A motion to consolidate this case into the related case has also been filed. (See  
6 Doc. 6). Further, the Motion to Amend, if granted, would add additional parties to this  
7 case who will be entitled to discovery and their presence may also impact the discovery  
8 conducted by the parties currently in this case. (Doc. 17). The Motion to Remand, if  
9 granted, would remove this case from this Court's docket. (Doc. 18). Accordingly, it  
10 would not be efficient for the parties to proceed with discovery in this case while those  
11 motions are pending.

12 Therefore, the parties have good cause for requesting the stay due to the possible  
13 effect of resolving all claims or issues in this case if the pending motions are granted.  
14 The parties believe a stay of the matter to be appropriate to conserve judicial resources.  
15 The parties have entered into the agreement in good faith and not for purposes of delay.

16 IT IS FURTHER AGREED AND STIPULATED that once the stay is lifted, any  
17 remaining parties will submit a renewed discovery schedule 30-days from the date the  
18 stay is lifted.

19 Dated: October 15, 2017

Dated: October 16, 2017

20 MORRIS LAW CENTER

BALLARD SPAHR LLP

21  
22 By: /s/ Timothy A. Wiseman

By: /s/ Sylvia O. Semper

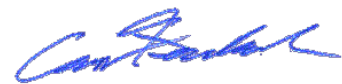
23 Sarah A. Morris, Esq.  
24 Nevada Bar No. 8461  
25 Timothy A. Wiseman, Esq.  
26 Nevada Bar No. 13786  
*Attorneys for Plaintiff, ZHK*

Abran E. Vigil, Esq.  
Nevada Bar No. 7548  
Sylvia O. Semper, Esq.  
Nevada Bar No. 12863  
*Attorney for Defendant, Wilmington Trust  
(signed by filing attorney with permission)*

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ORDER

IT IS SO ORDERED this 17th day of October, 2017.



UNITED STATES MAGISTRATE JUDGE

Respectfully submitted:

By: /s/ Timothy A. Wiseman  
Timothy A. Wiseman  
Nevada Bar No. 13786  
*Attorneys for Defendant, ZHK*

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO STAY DISCOVERY PENDING MOTIONS TO DISMISS** by the method indicated:

\_\_\_\_\_ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).

\_\_\_\_\_ **BY E-MAIL:** by transmitting via e-mail the document(s) listed above to the email addresses set forth below and/or included on the Court's Service List for the above-referenced case.

\_\_\_\_\_ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

\_\_\_\_\_ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.


\_\_\_\_\_ **BY PERSONAL DELIVERY:** by causing personal delivery via messenger service of the document(s) listed above to the person(s) at the address(es) set forth below.

  X   **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

and addressed to the following:

Ballard Spahr LLP  
Sylvia O. Semper    sempers@ballardspahr.com  
Abran E. Vigil     vigila@ballardspahr.com

Dated this 17<sup>th</sup> day of October, 2017

  
\_\_\_\_\_  
An employee of Morris Law Center