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11 *Attorneys for Defendant The Bank of New York Mellon Trust Company, National Association*
 12 *fka The Bank of New York Trust Company, N.A. as successor to JP Morgan Chase Bank, as*
 13 *Trustee for Residential Asset Mortgage Products, Inc.*

14 **IN THE UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16 1st ONE HUNDRED INVESTMENT POOL,
 17 LLC, a Nevada limited liability company,

18 Plaintiff,

19 vs.

20 CARMEN J. ROSE; MORTGAGE
 21 ELECTRONIC REGISTRATION
 22 SYSTEMS, INC.; CAPITOL COMMERCE
 23 MORTGAGE COMPANY; THE BANK OF
 24 NEW YORK MELLON TRUST
 25 COMPANY, NATIONAL ASSOCIATION,
 26 fka THE BANK OF NEW YORK TRUST
 27 COMPANY N.A. as successor the JP
 28 MORGAN CHASE BANK, as Trustee for
 RESIDENTIAL ASSET MORTGAGE
 PRODUCTS, INC.; SABLES, LLC; TAL
 ZISSU; THE 12017 OAKLAND HILLS
 DRIVE IRREVOCABLE TRUST; TAL
 XAVIER TRUST; XAVIER REYES;
 FASHION SHOW MALL, LLC; STATE OF
 NEVADA; SCOT OLIPHANT, AND DOES I
 through X, inclusive; and ROE
 CORPORATIONS I through X, inclusive,

Defendants.

Case No.: 2:17-cv-01233-JCM-PAL

**STIPULATION AND ORDER FOR STAY
 AND EXTENDING DEADLINE FOR
 DEFENDANT BNY TO ANSWER THE
 COMPLAINT AND FOR PLAINTIFF TO
 FILE A MOTION FOR REMAND**

First Request

1 Defendant The Bank of New York Mellon Trust Company, National Association, f/k/a
2 The Bank of New York Trust Company N.A. as successor the JP Morgan Chase Bank, as
3 Trustee for Residential Asset Mortgage Products, Inc. (“BNY”) and Plaintiff, 1st One Hundred
4 Investment Pool, LLC (“Plaintiff), by and through their respective counsel of record, stipulate
5 and agree to extend the time for BNY to file an Answer and for Plaintiff to file a Motion for
6 Remand by 10 judicial days each, respectively in order to discuss potential settlement and proper
7 forum of the case.

8 The current dates for filing an Answer and Motion for Remand are May 9, 2017 and June
9 1, 2017 respectively. The new deadline to Answer shall be May 23, 2017. The new deadline to
10 file a Motion for Remand shall be June 15, 2017.

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1 This Stipulation is reached in good faith and not for purpose of delay.

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3 **IT IS SO STIPULATED.**

<p>4 DATED this 9th day of May, 2017</p> <p>5 WRIGHT, FINLAY & ZAK, LLP</p> <p>6</p> <p>7 <u>/s/Patrick J. Davis</u></p> <p>8 Dana Jonathon Nitz, Esq. Nevada Bar No. 0050</p> <p>9 Natalie C. Lehman, Esq. Nevada Bar No. 12995</p> <p>10 Patrick J. Davis, Esq. Nevada Bar No. 13330</p> <p>11 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117</p> <p>12 (702) 475-7964; Fax: (702) 946-1345</p> <p>13 <u>pdavis@wrightlegal.net</u></p> <p>14 <i>Attorney for Defendants, The Bank of New</i></p> <p>15 <i>York Mellon Trust Company, National</i></p> <p>16 <i>Association fka The Bank of New York Trust</i></p> <p>17 <i>Company, N.A. as successor to JP Morgan</i> <i>Chase Bank, as Trustee for Residential</i> <i>Asset Mortgage Products, Inc.</i></p>	<p>DATED this 9th day of May, 2017</p> <p>The Law Office of Vernon Nelson</p> <p>7 <u>/s/Vernon A. Nelson, Esq.</u></p> <p>Vernon A. Nelson, Jr., Esq. 9480 S. Eastern Ave., Ste. 244 Las Vegas, NV 89123 <i>Attorney for Plaintiff, 1st One Hundred</i> <i>Investment Pool, LLC</i></p>
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18 **ORDER**

19 **IT IS SO ORDERED.**

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22 UNITED STATES MAGISTRATE JUDGE

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24 Dated: May 11, 2017