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

10 THE BANK OF NEW YORK MELLON FKA ) Case No.: 2:17-cv-01242-JAD-VCF  
11 THE BANK OF NEW YORK, AS TRUSTEE )  
12 FOR THE CERTIFICATEHOLDERS OF THE )  
13 CWABS INC., ASSET-BACKED )  
14 CERTIFICATES, SERIES 2006-22, ) **JOINT STIPULATION AND**  
15 Plaintiff, ) **ORDER TO STAY CASE**  
16 vs. ) **PENDING SETTLEMENT**  
17 NV MORTGAGE, INC. dba SOMA ) **NEGOTIATIONS**  
18 FINANCIAL, a Nevada corporation; )  
19 JONATHON DALE AMOS, an individual; )  
20 MELISSA AMOS, an individual; UNITED )  
STATES DEPARTMENT OF THE TREASURY )  
- INTERNAL REVENUE SERVICE, a U.S. )  
government agency; DOES I through X and ROE )  
BUSINESS ENTITIES XI through XX, )  
Defendants. )

21 IT IS HEREBY STIPULATED AND AGREED by and between Christina H. Wang,  
22 Esq. of the Fidelity National Law Group, counsel for Plaintiff THE BANK OF NEW YORK  
23 MELLON FKA THE BANK OF NEW YORK, AS TRUSTEE FOR THE  
24 CERTIFICATEHOLDERS OF THE CWABS INC., ASSET-BACKED CERTIFICATES,  
25 SERIES 2006-22 ("Plaintiff"); Boris Kukso, Esq. of the U.S. Department of Justice, counsel for  
26 Defendant UNITED STATES OF AMERICA (on behalf of the INTERNAL REVENUE  
27 SERVICE); and Erick M. Ferran, Esq. of Hitzke & Associates, counsel for Defendants NV

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1 MORTGAGE, INC. dba SOMA FINANCIAL, JONATHON DALE AMOS and MELISSA  
2 AMOS, as follows:

3 **WHEREAS,**

4 1. On or about October 6, 2017, this Court entered a Discovery Plan and Scheduling  
5 Order setting forth the discovery and other deadlines governing this case (Doc. 10).

6 2. Since then, the parties have actively and in good faith engaged and participated in  
7 discovery activities.

8 3. At this juncture, the parties have agreed to undertake settlement negotiations and  
9 believe that they may be able to resolve this case in its entirety.

10 4. The parties believe that the Discovery Plan and Scheduling Order does not  
11 permit sufficient time to both undertake meaningful settlement negotiations and complete all  
12 discovery activities.

13 5. The parties believe that their chances for case resolution are enhanced if they are  
14 permitted to continue their remaining discovery activities (including, but not limited to,  
15 numerous depositions and written discovery).

16 6. The parties believe that their chances for case resolution are further enhanced if  
17 they are able to devote some of the financial resources currently earmarked for litigation to  
18 funding a potential settlement.

19 7. The parties believe that a stay of this case for ninety (90) days, up to and  
20 including April 9, 2018, is reasonable in light of the time necessary to obtain client approval of  
21 settlement authority and prepare and finalize all attendant settlement documents.

22 8. In the event that their settlement efforts fail, the parties will require additional  
23 time to resume discovery activities and trial preparation.

24 **WHEREFORE,**

25 IT IS HEREBY STIPULATED AND AGREED that a stay of this case for ninety (90)  
26 days, up to and including April 9, 2018, would help to accomplish the settlement objectives  
27 described herein.

28 IT IS FURTHER STIPULATED AND AGREED that if this case does not resolve by

1 April 9, 2018, the parties will submit a stipulation and proposed order to lift stay as well as an  
2 updated, proposed Discovery Plan and Scheduling Order extending the case deadlines by the  
3 corresponding period of stay for the Court's approval.

4 DATED this 9<sup>th</sup> day of January, 2018.

5 FIDELITY NATIONAL LAW GROUP

6 RICHARD E. ZUCKERMAN  
7 Principal Deputy Assistant Attorney General

8 /s/ Christina H. Wang  
9 CHRISTINA H. WANG, ESQ.  
10 Nevada Bar No. 9713  
11 8363 W. Sunset Road, Suite 120  
12 Las Vegas, Nevada 89113  
13 *Attorneys for Plaintiff*

8 /s/ Boris Kukso  
9 BORIS KUKSO, ESQ.  
10 Trial Attorney, Tax Division  
11 U.S. Department of Justice  
12 P.O. Box 683  
13 Washington, D.C. 20044

14 Of Counsel:  
15 DAYLE ELIESON  
16 Interim U.S. Attorney

17 *Attorneys for the United States of America*

18 HITZKE & ASSOCIATES

19 /s/ Erick M. Ferran  
20 ERICK M. FERRAN, ESQ.  
21 Nevada Bar No. 9554  
22 2030 E. Flamingo Road, Suite 115  
23 Las Vegas, Nevada 89119  
24 *Attorneys for Defendants NV Mortgage, Inc.*  
25 *dba Soma Financial, Jonathan Dale Amos,*  
26 *and Melissa Amos*

27 IT IS SO ORDERED.



28 **UNITED STATES MAGISTRATE JUDGE**

29 Dated: 1-9-2018