

1 MICHAEL N. BEEDE, ESQ.
 Nevada Bar No. 13068
 2 JAMES W. FOX, ESQ.
 Nevada Bar No. 13122
 3 **THE LAW OFFICE OF MIKE BEEDE, PLLC**
 4 2470 St. Rose Pkwy., Ste. 307
 Henderson, NV 89074
 5 eservice@legalLV.com
 Telephone (702) 473-8406
 6 Facsimile (702) 832-0248

7 *Attorney for Susan Patchen, The Eagle and The Cross, LLC, and A Accountable Carpet Care*

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

10 NATIONSTAR MORTGAGE, LLC, and
 11 FEDERAL NATIONAL MORTGAGE
 ASSOCIATION,

12 Plaintiff,

13 v.

14 CANYON WILLOW TROP OWNERS'
 ASSOCIATION; NEVADA ASSOCIATION
 15 SERVICES, INC.; SUSAN PATCHEN; THE
 16 EAGLE AND THE CROSS, LLC; and A
 ACCOUNTABLE CARPET CARE

17 Defendants.

18 SUSAN PATCHEN; THE EAGLE AND THE
 19 CROSS, LLC; and A ACCOUNTABLE
 CARPET CARE,

20 Counterclaimants,

21 v.

22 NATIONSTAR MORTGAGE, LLC; DIANA L.
 WHITE; and FEDERAL NATIONAL
 23 MORTGAGE ASSOCIATION

24 Counter-defendants

CASE NO. 2:17-cv-01581-APG-DJA

STIPULATION AND
ORDER TO
AMEND COUNTERCLAIM

25
 26 Defendants/Crossclaimants Susan Patchen, The Eagle and The Cross, LLC, and A
 27 Accountable Carpet Care (hereafter, collectively "Defendants") by and through their attorneys of
 28 record, Michal N. Beede, Esq. and James W. Fox, Esq., of The Law Office of Mike Beede, PLLC,

1 and Plaintiffs/Counter-Defendants Nationstar Mortgage LLC and Federal National Mortgage
2 Association (hereafter, collectively, “Plaintiffs”), by and through their attorneys of record, Melanie
3 D. Morgan Esq. and Tenesa S. Powell, Esq., of Akerman, LLP, and Defendant Canyon Willow Trop
4 Owners’ Association , by and through its attorneys of record, Megan H. Hummel, Esq. and Amanda
5 A. Ebert Esq., of Lipson Neilson, P.C. stipulate and agree to the following:

- 6 1. Defendants’ Susan Patchen, The Eagle and The Cross, LLC, and A Accountable Carpet Care
7 filed their Answer to First Amended Complaint and Counterclaim (ECF No. 24) on October
8 21, 2019.
- 9 2. Defedants’ named previous owner Diana L. White as a Counter-Defendant.
- 10 3. When Defendants’ attempted to serve Ms. White a copy of the Summons (ECF No. 31) and
11 Answer to First Amended Complaint and Counterclaim (ECF No. 24), Defendants’ were
12 informed that Ms. White was deceased.
- 13 4. The parties hereto stipulate to add The Estate of Diana L. White and Any Unknown Heirs
14 as additional Counter-Defendants.
- 15 5. Per the Scheduling Order (ECF No. 33), “all motions to amend the pleadings or add parties
16 shall be filed by not later than **February 7, 2020...**”

16 ///
17 ///
18 ///
19 ///
20 ///
21 ///
22 ///
23 ///
24 ///
25 ///
26 ///
27 ///
28 ///

1 6. Defendants' proposed first amended counterclaim attached hereto as Exhibit 1 shall be
2 filed with this court.

3
4 DATED this 11th day of December, 2019. DATED this 10th day of December, 2019.

5 THE LAW OFFICE OF MIKE BEEDE, PLLC AKERMAN LLP

6 By: /s/ James W. Fox
7 MICHAEL BEEDE, ESQ.
8 Nevada Bar No. 13068
9 JAMES W. FOX, ESQ.
10 Nevada Bar No. 13122
11 2470 St. Rose Pkwy, Suite 307
12 Henderson, NV 89074
13 T: 702-473-8406
14 *Attorney for Susan Patchen, The Eagle
15 and The Cross, LLC, and A Accountable
16 Carpet Care*

By: /s/ Tenesa S. Powell
MELANIE D. MORGAN, ESQ.
Nevada Bar No. 8215
TENESA S. POWELL, ESQ.
Nevada Bar No. 12488
1635 Village Center Circle, Suite 200
Las Vegas, NV 89134
T: 702-634-5000
*Attorneys for Nationstar Mortgage
LLC and Federal National Mortgage
Association*

17 DATED this 10th day of December, 2019.

18 LIPSON NEILSON P.C.

19 By: /s/ Megan H. Hummel
20 MEGAN H. HUMMEL, ESQ.
21 Nevada Bar No. 12404
22 AMANDA A. EBERT, ESQ.
23 Nevada Bar No. 12731
24 9900 Covington Cross Drive, Suite 120
25 Las Vegas, NV 89144
26 T: 702-382-1500
27 *Attorneys for Canyon Willow Trop
28 Owners' Association*

Case Name: Nationstar Mortgage
LLC and Federal National Mortgage
Association v. Canyon Willow Trop
Owners' Association, et al.
Case Number: 2:16-cv-01581-APG-DJA

ORDER

The Court, having reviewed the stipulation of the parties, and good cause appearing
therefore,

IT IS HEREBY ORDERED that Defendants' are permitted to amend their
Counterclaims to include The Estate of Diana L. White and Any Unknown Heirs as additional
Counter-Defendants. The Amended Complaint attached hereto as Exhibit 1 shall be filed with
this Court.

IT IS SO ORDERED.

Dated this 12th day of December, 2019.



Daniel J. Albregts
United States Magistrate Judge

Submitted by:
THE LAW OFFICE OF MIKE BEEDE, PLLC

By: /s/ James W. Fox
MICHAEL BEEDE, ESQ.
Nevada Bar No. 13068
JAMES W. FOX, ESQ.
Nevada Bar No. 13122
2470 St. Rose Pkwy, Suite 307
Henderson, NV 89074
T: 702-473-8406
*Attorney for Susan Patchen, The Eagle and The Cross, LLC, and A Accountable Carpet
Care*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and that I am not a party to, not interested in, this action. On the 11th day of December, 2019, I caused a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO AMEND COUNTERCLAIM** to be served to all parties in this litigation by the method indicated:

- U.S. Mail
- U.S. Certified Mail
- Facsimile Transmissions
- Federal Express
- Electronic Service via CM/ECF
- E-Mail

/s/ Michael Madden
An Employee of The Law Office of Mike Beede, PLLC