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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

9 FEDERAL NATIONAL MORTGAGE  
ASSOCIATION,

10 Plaintiff,

11 | v.

12 JAYEM FAMILY L.P., and SUN CITY  
13 ANTHEM COMMUNITY ASSOCIATION,  
INC.,

14 Defendants.

Case No. 2:17-cv-01800-JAD-GWF

**STIPULATION AND ORDER TO  
EXTEND RESPONSIVE PLEADING  
DEADLINE**

**(First Request)**

17 Plaintiff Federal National Mortgage Association (“Fannie Mae”), Defendant Jayem Family  
18 L.P. (“Jayem”), and Defendant Sun City Anthem Community Association (“Sun City Anthem”)  
19 (collectively hereinafter referred to as the “Parties”), by and through their respective counsel of  
20 record, hereby stipulate and agree to extend the deadline for Jayem to respond to the Complaint  
21 (ECF No. 1). This is the Parties’ first request.

22       1. Jayem has retained counsel in this matter after having been served through the  
23 Nevada Secretary of State.

24        2.        Fannie Mae and Jayem are currently in settlement discussions in an effort to resolve  
25 the title dispute to the property at issue in this case, as well as several other properties where Jayem  
26 (or its affiliates) and Fannie Mae or Freddie Mac are claiming adverse interests.

3. One of the goals of the settlement discussions is to save litigation costs in this action.

1 as well as other lawsuits where Jayem and Fannie Mae or Freddie Mac are parties.

2       4.     Given that the settlement discussions involve multiple or more than one property  
3 and lawsuit, and that time will be needed to gather and collect data for each property, the Parties  
4 anticipate it will take approximately 90 days to determine if a settlement can be accomplished.

5       5.     Additionally, on October 23, 2017, the Court stayed this case in light of the NRED  
6 mediation scheduled for December 5, 2017, and provided that the Parties can lift the stay following  
7 the mediation.

8       6.     Accordingly, the Parties agree that good cause exists to extend Jayem's responsive  
9 pleading deadline to fourteen days after the stay is lifted in this case. The Parties hereby respectfully  
10 request that the Court enter an order confirming said deadline.

11           **IT IS SO STIPULATED AND AGREED.**

12           Dated this 27th day of October, 2017.

12           Dated this 27th day of October, 2017.

13           WRIGHT FINLAY & ZAK

13           TAKOS LAW GROUP, LTD.

14           \_\_\_\_\_  
15           /s/ Christina V. Miller  
15           Christina V. Miller, Esq., NV Bar No. 12448  
16           7785 W. Sahara Avenue, Suite 200  
16           Las Vegas, NV 89117

14           \_\_\_\_\_  
15           /s/ Zachary P. Takos  
15           Zachary P. Takos, Esq., NV Bar No. 11293  
16           1980 Festival Plaza Drive, Suite 300  
16           Las Vegas, NV 89135

17           Dated this 27th day of October, 2017.

18           THE CLARKSON LAW GROUP, P.C.

19           \_\_\_\_\_  
20           /s/ Matthew McAlonis  
20           Matthew McAlonis, Esq., NV Bar No. 11203  
21           2300 West Sahara Avenue, Suite 950  
21           Las Vegas, NV 89102

22           **IT IS SO ORDERED.**

23           \_\_\_\_\_  
24             
24           UNITED STATES MAGISTRATE JUDGE

25           Dated: 10/30/2017