

1 **COLT B. DODRILL, ESQ.**
 Nevada Bar No. 9000
 2 **WOLFE & WYMAN LLP**
 6757 Spencer St.
 3 Las Vegas, NV 89119
 Tel: (702) 476-0100
 4 Fax: (702) 476-0101
 cbdodrill@wolfewyman.com

5 **Attorneys for Plaintiffs**
 6 **DITECH FINANCIAL LLC and**
 7 **FEDERAL NATIONAL MORTGAGE**
ASSOCIATION

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

11 DITECH FINANCIAL LLC; FEDERAL
 NATIONAL MORTGAGE ASSOCIATION, a
 12 government-sponsored entity,
 13 Plaintiffs,
 14 v.
 15 LOCKMOR HOLDINGS, LLC.; DOES 1
 through 10, inclusive; ROES Business Entities 1
 16 through 10, inclusive; and all others who claim
 interest in the subject property located at 520
 17 Arrowhead Trail, #1122, Henderson, NV 89015 .
 18 Defendants.

CASE NO.: 2:17-cv-01829-JAD-PAL

**STIPULATION AND ORDER TO EXTEND
 TIME TO RESPOND TO MOTIONS
 (FIRST REQUEST)**

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 20 Pursuant to LR 6-1(b), DITECH FINANCIAL LLC (formerly known as Green Tree
 21 Servicing LLC (hereinafter “Ditech”), FEDERAL NATIONAL MORTGAGE ASSOCIATION
 22 (hereinafter “Fannie Mae”) and Lockmor Holdings, LLC (hereinafter after to as “Lockmor”) by and
 23 through their attorneys, hereby stipulate as follows:

24 WHEREAS, on September 1, 2017, Defendant Lockmor moved to dismiss. ECF No. 14.

25 WHEREAS, Fannie Mae and Ditech’s response to the Motion to Dismiss is due September
 26 15, 2017.

27 WHEREAS, on September 1, 2017, Ditech moved for summary judgment. ECF No. 15.

28 WHEREAS, Lockmor’s response to the Motion for Summary Judgment is due on September



1 22, 2017.

2 WHEREAS the parties wish to extend the deadlines.

3 Good cause exists to extend the response deadlines based on the volume of cases raising
4 similar issues handled by counsel for Ditech and Fannie Mae. An extension for Ditech and Fannie
5 Mae to respond to Defendant’s Motion to Dismiss will allow Ditech and Fannie Mae the opportunity
6 to more properly address the myriad of substantive issues raised in the Motion to Dismiss, including,
7 inter alia, the Federal Foreclosure Bar and the constitutionality of NRS 116.3116, et al. An
8 extension for Lockmor to respond to Ditech’s Motion for Summary Judgment will allow it the
9 opportunity to more properly address the various issues concerning the constitutionality of NRS
10 116.3116, et al.

11 Therefore, the parties stipulate and agree as follows:

12 THAT Ditech and Fannie Mae shall be granted an extension to **September 29, 2017** to file
13 their Response to Defendant’s Motion to Dismiss (ECF No. 14).

14 THAT Lockmor shall be granted an extension to **October 6, 2017** to file its Response to
15 Ditech’s Motion for Summary Judgment (ECF No. 15).

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1 THAT this stipulated extension is not submitted for any improper purpose or delay.
2 **IT IS SO STIPULATED.**

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4 DATED: September 13, 2017

WOLFE & WYMAN LLP

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6 By: /s/ Colt B. Dodrill

COLT B. DODRILL, ESQ.
7 Nevada Bar No. 9000
8 6757 Spencer St.
Las Vegas, NV 89119

9 Attorneys for Plaintiffs
10 DITECH FINANCIAL LLC and FEDERAL
NATIONAL MORTGAGE ASSOCIATION

11 DATED: September 13, 2017

MCCOY LAW GROUP, Ltd.

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13
14 By: /s/ Brandon McCoy

BRANDON MCCOY, ESQ.
15 Nevada Bar No. 10402
16 625 S. 8th St., 2nd Floor
Las Vegas, NV 89101

17 Attorneys for Defendant
18 LOCKMOR HOLDINGS, LLC

19 **IT IS SO ORDERED.**

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21 
UNITED STATES DISTRICT JUDGE

22 Dated: September 13, 2017.
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