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10 *Attorneys for Defendant, HSBC Bank USA N.A., as Trustee on Behalf of ACE Securities Corp.*  
 11 *Home Equity Loan Trust and for the Registered Holders of ACE Securities Corp. Home Equity*  
 12 *Loan Trust Series 2006-HE2, Asset Backed Pass Through Certificates*

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

15 HOLLYVALE RENTAL HOLDINGS, LLC, a  
 16 Nevada limited liability company,

17 Plaintiff,

18 vs.

19 RUBY F. PINEDA; an individual; LILIBETH  
 20 F. LACUESTA, an individual; HSBC BANK  
 21 USA N.A., AS TRUSTEE ON BEHALF OF  
 22 ACE SECURITIES CORP. HOME EQUITY  
 23 LOAN TRUST AND FOR THE  
 24 REGISTERED HOLDERS OF ACE  
 25 SECURITIES CORP. HOME EQUITY LOAN  
 26 TRUST SERIES 2006-HE2, ASSET  
 27 BACKED PASS THROUGH  
 28 CERTIFICATES; All other persons unknown  
 claiming any right, title, estate, lien or interest  
 in the real property described in the Complaint  
 adverse to Plaintiff's ownership, or any cloud  
 upon Plaintiff's title thereto; DOES I through  
 V; and ROE Corporations I through V,

Case No.: 2:17-cv-01833-RFB-NJK

**STIPULATION AND ORDER TO  
 EXTEND TIME TO ANSWER OR  
 OTHERWISE PLEAD IN RESPONSE TO  
 PLAINTIFF'S COMPLAINT**

**(First Request)**

1 Defendant, HSBC Bank USA N.A., as Trustee on Behalf of ACE Securities Corp. Home  
2 Equity Loan Trust and for the Registered Holders of ACE Securities Corp. Home Equity Loan  
3 Trust Series 2006-HE2, Asset Back Pass Through Certificates (“HSBC”), by and through its  
4 attorney of record Patrick J. Davis, Esq. of the law firm of Wright, Finlay & Zak, LLP and  
5 Plaintiff Hollyvale Rental Holdings, LLC (“Hollyvale”), by and through its attorney of record  
6 Bradley G. Sims, Esq. of the law firm Hutchison & Steffen, PLLC, hereby stipulate and agree as  
7 follows with regard to HSBC’s obligation to Answer or otherwise plead in response to  
8 Hollyvale’s Complaint by July 12, 2017.

9 Counsel for HSBC needs additional time to adequately respond to the arguments raised in  
10 Hollyvale’s Complaint. Due to the fluid nature of case law and inconsistent results regarding  
11 quiet title actions based on HOA lien foreclosure sales regarding the same contested issues in  
12 this case, counsel needs additional time to draft an adequate response.

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1 The deadline to Answer or otherwise Plead in response to Plaintiff's Complaint is hereby  
2 extended until July 26, 2017. This is the first request for such an extension, and it is made and in  
3 good faith and not for purposes of delay.

4 IT IS SO STIPULATED AND AGREED.

5 Dated this 12th day of July, 2017.

Dated this 12th day of July, 2017.

6 WRIGHT, FINLAY & ZAK, LLP

HUTCHISON & STEFFEN, PLLC

7 /s/ Patrick J. Davis, Esq.

/s/ Bradley G. Sims, Esq.

8 Dana Jonathon Nitz, Esq.

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16 *Attorneys for Defendant, HSBC Bank USA*

17 *N.A., as Trustee on Behalf of ACE Securities*

18 *Corp. Home Equity Loan Trust and for the*

19 *Registered Holders of ACE Securities Corp.*

20 *Home Equity Loan Trust Series 2006-HE2,*

21 *Asset Backed Pass Through Certificates*

22 **ORDER**

23 **IT IS SO ORDERED.**

24 Dated: July 17, 2017

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27 UNITED STATES MAGISTRATE JUDGE  
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