

ELAINE A. DOWLING, ESQ.
Nevada Bar No. 8051
EAD Law Group, LLC
6671 S. Las Vegas Blvd., Suite 210
Las Vegas, Nevada 89119
Telephone: (702) 761-6769
Fax: (702) 761-6701
Email: ead@eadlawgroup.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * * *

RICHARD A. TAULLI, an individual,

CASE NO.: 2:17-cv-01870-JCM-PAL

Plaintiff,

VS

EVERBANK, a corporation, COUNTRYWIDE MORTGAGE, a corporation, OAKTREE FUNDING, a corporation, TRUSTEE CORPS, a corporation; DOES I through X, inclusive; and ROE ENTITIES XI through M, inclusive,

Defendants.

**STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF'S RESPONSE TO
DEFENDANT EVERBANK'S MOTION TO DISMISS (FIRST REQUEST)**

COMES NOW Plaintiff, RICHARD TAULLI, and Defendant EVERBANK, by and through their undersigned counsel, and hereby stipulate and agree as follows:

1 1. On or about June 15, 2017, Plaintiff filed his Complaint and Petition for
2 Declaratory Relief and Injunctive Relief in Clark County District Court (Case No.: A-17-
3 756933). The action relates to real property commonly known as 2808 Cowan Circle, Las
4 Vegas, NV 89107; APN 139-32-214-017.

5 2. Defendant EVERBANK removed the action to United States District Court,
6 District of Nevada on July 7, 2017.

7 3. On July 14 2017, Defendant EVERBANK filed its Motion to Dismiss Plaintiff's
8 Complaint. Plaintiff's deadline to file a response to that motion is currently July 28 2017.

9 4. Plaintiff and Defendant EVERBANK have agreed to extend the deadline for
10 Plaintiff's Response. Plaintiff shall have an extension of time until August 11, 2017 in which to
11 file a Response to Defendant EVERBANK'S Motion to Dismiss.

12 5. Nothing in this Stipulation and Order is intended to be, or will be, construed as
13 an admission of the claims or defenses of the parties.

14 6. This Stipulation is made in good faith in an effort to save time, money, and
15 expense on the part of the parties, as well as to save judicial resources of this Court.

16 DATED this 27th day of July, 2017.

17
18 By: /s/ Elaine A. Dowling
19 Elaine A. Dowling, Esq.
20 EAD LAW GROUP, LLC
21 6671 S. Las Vegas Blvd., Suite 210
22 Las Vegas, NV 89119
23 Attorney for Plaintiff

17
18 By: /s/ Nathan F. Smith
19 Nathan F. Smith, Esq.
20 MALCOLM CISNEROS
21 608 South 8th Street
22 Las Vegas, NV 89101
23 Attorney for Defendant EverBank

24 IT IS SO ORDERED.

25
26 DATED July 28, 2017.

27
28 
UNITED STATES DISTRICT JUDGE