

1 GAYLE A. KERN, ESQ.  
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7 *Attorneys for Defendant*  
 8 *Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 USROF III LEGAL TITLE TRUST 2015-1,  
 BY U.S. BANK NATIONAL ASSOCIATION,  
 12 AS LEGAL TITLE TRUSTEE,

Case No.: 2:17-CV-02083-RFB-PAL

13 Plaintiff,

14 v.

15 TBD, LLC, a Nevada Limited-Liability  
 16 Company; TBR I, LLC, a Nevada Limited-  
 17 Liability Company; AIRMOTIVE  
 INVESTMENTS, LLC, a Nevada Limited-  
 18 Liability Company; HIGHLAND RANCH  
 19 HOMEOWNERS ASSOCIATION, a Nevada  
 Non-Profit Corporation; KERN &  
 20 ASSOCIATES, LTD., a Nevada Corporation,

21 Defendants.

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR GAYLE A.  
 KERN, LTD. DBA KERN &  
 ASSOCIATES, LTD. TO ANSWER OR  
 OTHERWISE RESPOND TO  
 COMPLAINT**

[First Request]

22 \_\_\_\_\_/

23 ***IT IS HEREBY STIPULATED*** between Plaintiff, USROF III Legal Title Trust 2015-1,  
 24 by U.S. Bank National Association, as Legal Title Trustee (“Plaintiff”), by and through its counsel,  
 25 Wright, Finlay & Zak, LLP, and Defendant, Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.  
 26 (“Kern”), by and through its counsel Kern & Associates, Ltd., to extend the deadline for Kern to  
 27 answer or otherwise respond to Plaintiff’s Complaint up-to-and-including September 22, 2017.  
 28

1 Plaintiff filed its Complaint on or about August 1, 2017, and Kern was served on August  
2 11, 2017. The deadline for Kern to answer or otherwise respond to the Complaint is September 1,  
3 2017.

4 Plaintiff and Kern (collectively referred to as the "Parties") stipulate and agree to extend  
5 the deadline for Kern's answer or other response to the Complaint up-to-and-including September  
6 22, 2017. The Parties are engaged in substantive discussions with regard to the claims and defenses  
7 in this matter, and wish to conserve the time and resources of the Parties and the Court while such  
8 discussions are ongoing. Therefore, good cause exists for the extension. This is the first request  
9 for an extension of time with respect to this matter and is not intended to cause delay or prejudice  
10 to any party.  
11

12 DATED this 28<sup>th</sup> day of August, 2017.

DATED this 29<sup>th</sup> day of August, 2017.

13 ***KERN & ASSOCIATES, LTD.***

***WRIGHT, FINLAY & ZAK, LLP***

14 /s/ Karen M. Ayarbe, Esq.

/s/ Paterno C. Jurani, Esq.

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Ltd. dba Kern & Associates, Ltd.*

*Attorneys for Plaintiff USROF III Legal Title  
Trust 2015-1, by U.S. Bank National  
Association, as Legal Title Trustee*

21 **ORDER**

22 ***IT IS SO ORDERED.***

23 DATED this 31st day of August, 2017.

24   
25 UNITED STATES MAGISTRATE JUDGE

26 ***Respectfully Submitted By:***

27 /s/ Karen M. Ayarbe, Esq.

KAREN M. AYARBE, ESQ.

28 *Attorneys for Defendant Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.*

1 **CERTIFICATE OF SERVICE**

2 Pursuant to the Fed. R. Civ. Proc. 5(b) and the United States District Court CM/ECF  
3 Electronic Filing Procedure IV(B), a true and correct copy of the foregoing ***STIPULATION AND***  
4 ***ORDER TO EXTEND DEADLINE FOR GAYLE A. KERN, LTD. DBA KERN &***  
5 ***ASSOCIATES, LTD. TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT (First***  
6 ***Request)*** was transmitted electronically through the Court’s e-filing electronic system to the  
7 attorney(s) associated with this case.  
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16  
17 /s/ Christine A. Lamia \_\_\_\_\_  
18 An Employee of Kern & Associates, Ltd.  
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