

1 GAYLE A. KERN, ESQ.
2 Nevada Bar No. 1620
3 KAREN M. AYARBE, ESQ.
4 Nevada Bar No. 3358
5 KERN & ASSOCIATES, LTD.
6 5421 Kietzke Lane, Ste. 200
7 Reno, Nevada 89511
8 Tel: (775) 324-5930
9 Fax: (775) 324-6173
10 Email: karenayarbe@kernltd.com

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

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 USROF III LEGAL TITLE TRUST 2015-1,
16 BY U.S. BANK NATIONAL ASSOCIATION,
17 AS LEGAL TITLE TRUSTEE,

18 Case No.: 2:17-cv-02083-RFB-PAL

19 Plaintiff,

20 v.

21 TBD, LLC, a Nevada Limited-Liability
22 Company; TBR I, LLC, a Nevada Limited-
23 Liability Company; AIRMOTIVE
24 INVESTMENTS, LLC, a Nevada Limited-
25 Liability Company; HIGHLAND RANCH
26 HOMEOWNERS ASSOCIATION, a Nevada
27 Non-Profit Corporation; KERN &
28 ASSOCIATES, LTD., a Nevada Corporation,

29 Defendants.

30 **STIPULATION AND ORDER TO
31 EXTEND DEADLINE FOR GAYLE A.
32 KERN, LTD. DBA KERN &
33 ASSOCIATES, LTD. TO ANSWER OR
34 OTHERWISE RESPOND TO
35 COMPLAINT**

36 [Third Request]

37 **IT IS HEREBY STIPULATED** between Plaintiff, USROF III Legal Title Trust 2015-1,
38 by U.S. Bank National Association, as Legal Title Trustee (“Plaintiff”), by and through its counsel,
39 Wright, Finlay & Zak, LLP, and Defendant, Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.
40 (“Kern”), by and through its counsel Kern & Associates, Ltd., to extend the deadline for Kern to
41 answer or otherwise respond to Plaintiff’s Complaint up-to-and-including October 27, 2017.
42

1 Pursuant to a prior Stipulation and Order, the current deadline for Kern to file its answer
2 or otherwise respond to the Complaint is September 22, 2017.

3 Plaintiff and Kern (collectively referred to as the “Parties”) stipulate and agree to an
4 additional, extension of the deadline for Kern’s answer or other response to the Complaint up-to-
5 and-including October 27, 2017. The Parties continue progress in substantive discussions with
6 regard to the claims and defenses in this matter, and wish to conserve the time and resources of
7 the Parties and the Court while such discussions move forward. Therefore, good cause exists for
8 the extension. This is the third request for an extension of time with respect to this matter and is
9 not intended to cause delay or prejudice to any party.

10 DATED this 6th day of October, 2017.

11 **KERN & ASSOCIATES, LTD.**

12 /s/ Karen M. Ayarbe, Esq.

13 KAREN M. AYARBE, ESQ.

14 Nevada Bar No. 3358

15 5421 Kietzke Lane, Ste. 200

16 Reno, NV 89511

17 Tel: (775) 324-5930

18 Fax: (775) 324-6173

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

20 DATED this 6th day of October, 2017.

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

22 /s/ Paterno C. Jurani, Esq.

23 PATERNO C. JURANI, ESQ.

24 Nevada Bar No. 8136

25 7785 W. Sahara Ave., Suite 200

26 Las Vegas, NV 89117

27 Tel: (702) 475-7964

28 Fax: (702) 946-1345

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

30 **ORDER**

31 ***IT IS SO ORDERED.***

32 DATED this 12th day of October, 2017.

33 
34 UNITED STATES MAGISTRATE JUDGE

35 ***Respectfully Submitted By:***

36 /s/ Karen M. Ayarbe, Esq.

37 KAREN M. AYARBE, ESQ.

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

CERTIFICATE OF SERVICE

Pursuant to the Fed. R. Civ. Proc. 5(b) and the United States District Court CM/ECF Electronic Filing Procedure IV(B), a true and correct copy of the foregoing ***STIPULATION AND ORDER TO EXTEND DEADLINE FOR GAYLE A. KERN, LTD. DBA KERN & ASSOCIATES, LTD. TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT (Third Request)*** was transmitted electronically through the Court's e-filing electronic system to the attorney(s) associated with this case.

PATERNO C. JURANI

pjurani@wrightlegal.net
glacascia@wrightlegal.net
NVfile@wrightlegal.net

RYAN WILLIAM LEARY

rleary@laxalt-nomura.com
wrawson@laxalt-nomura.com

NATALIE C. LEHMAN

nlehman@wrightlegal.net
NVefile@wrightlegal.net
lcox@wrightlegal.net

DANA JONATHON NITZ

dnitz@wrightlegal.net
NVefile@wrightlegal.net

HOLLY S PARKER

hparker@laxalt-nomura.com
rleary@laxalt-nomura.com
kmartin@laxalt-nomura.com

TIMOTHY RHODA

croteaulaw@croteaulaw.com
receptionist@croteaulaw.com

/s/ Christine A. Lamia

An Employee of Kern & Associates, Ltd.