

1 Russell J. Burke
 Nevada Bar No. 12710
 2 BALLARD SPAHR LLP
 1980 Festival Plaza Drive, Suite 900
 3 Las Vegas, Nevada 89135
 Telephone: (702) 471-7000
 4 Facsimile: (702) 471-7070
 burker@ballardspahr.com
 5
 Louis L. Chodoff (admitted pro hac vice)
 6 N.J. Bar No. 037281988
 Christopher T. Cognato (admitted pro hac vice)
 7 N.J. Bar No. 020292009
 BALLARD SPAHR LLP
 8 210 Lake Drive East, Suite 200
 Cherry Hill, New Jersey 08002
 9 Telephone: (856) 761-3400

10 *Attorneys for Plaintiff Freedom*
 11 *Mortgage Corporation*

12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 **FREEDOM MORTGAGE**
 15 **CORPORATION,**

16 Plaintiff,

17 vs.

18 **CROSSCOUNTRY MORTGAGE, INC.,**

19 Defendant.

Case No. 2:18-cv-00270-APG-CWH

**STIPULATION AND ORDER TO
 EXTEND TIME TO RESPOND TO
 COUNTERCLAIM**

(First Request)

20 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Plaintiff Freedom Mortgage
 21 Corporation (“Plaintiff”) and Defendant CrossCountry Mortgage, Inc. (“Defendant”),
 22 by and through their respective attorneys of record, hereby stipulate to the following:

- 23 1. On June 1, 2018, Defendant filed its Answer and Counterclaim in this
 24 matter;
- 25 2. Plaintiff’s deadline to file and serve a responsive pleading to the
 26 Counterclaim is currently June 22, 2018;
- 27 3. Plaintiff and Defendant agree that Plaintiff shall have up to and
 28 including July 23, 2018 to serve its responsive pleading to the Counterclaim;

BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
LAS VEGAS, NEVADA 89135
(702) 471-7000 FAX (702) 471-7070

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4. The purpose of the extension is that the Counterclaim contains factually intensive allegations and additional time is required to fully investigate and file a responsive pleading; and

5. This stipulation and order is made in good faith and not for purposes of delay.

Dated: June 6, 2018

BALLARD SPAHR LLP

SMITH CARBAJAL

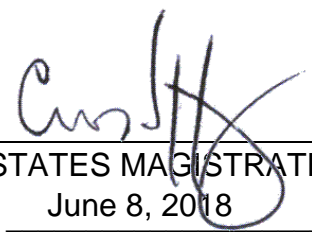
By: /s/ Russell J. Burke
Russell J. Burke
Nevada Bar No. 12710
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

By: /s/ Hector J. Carbajal
Hector J. Carbajal
Nevada Bar No. 6247
2430 Paseo Del Prada, Suite D203
Las Vegas, Nevada 89102

Louis L. Chodoff (admitted pro hac vice) *Attorneys for CrossCountry Mortgage, Inc.*
Christopher C. Cognato (admitted pro hac vice)
210 Lake Drive East, Suite 200
Cherry Hill, New Jersey 08002

Attorneys for Freedom Mortgage Corporation

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: June 8, 2018