

SMITH LARSEN & WIXOM
 ATTORNEYS
 HILLS CENTER BUSINESS PARK
 1935 VILLAGE CENTER CIRCLE
 LAS VEGAS, NEVADA 89134
 (702) 252-5002 • (702) 252-5006

1 Kent F. Larsen, Esq.
 Nevada Bar No. 3463
 2 Christopher L. Benner, Esq.
 Nevada Bar No. 8963
 3 SMITH LARSEN & WIXOM
 4 Hills Center Business Park
 1935 Village Center Circle
 5 Las Vegas, Nevada 89134
 6 Tel: (702) 252-5002
 Fax: (702) 252-5006
 7 Email: kfl@slwlaw.com
 clb@slwlaw.com
 8 Counsel for Plaintiff Federal National
 9 Mortgage Association and
 JPMorgan Chase Bank, N.A.

Asim Varma, Esq.
 Howard N. Cayne, Esq.
 Michael A.F. Johnson, Esq.
 ARNOLD & PORTER LLP
 601 Massachusetts Avenue NW
 Washington, DC 20001
 Tel: (202) 942-5000
 asim.varma@aporter.com;
 howard.cayne@aporter.com;
 michael.johnson@aporter.com
 Leslie Bryan Hart, Esq.
 Nevada Bar No. 4932
 FENNEMORE CRAIG PC
 300 E. Second St. Suite 1510
 Reno, NV 89501
 Counsel for Federal Housing Finance Agency

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

13 FEDERAL HOUSING FINANCE AGENCY,
 in its capacity as Conservator of Federal
 14 National Mortgage Association; FEDERAL
 NATIONAL MORTGAGE ASSOCIATION;
 15 and, JPMORGAN CHASE BANK, N.A
 Plaintiffs,
 16 vs.
 17 LN MANAGEMENT, LLC,
 18 Defendant.

Case No.:2:18-cv-00371-RFB-GWF

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND BRIEFING
 SCHEDULE FOR DEFENDANT’S
 MOTION TO DISMISS**

(First Request)

19 Plaintiffs Federal Housing Finance Agency (“FHFA” or the “Conservator”), in its
 20 capacity as Conservator for Federal National Mortgage Association (“Fannie Mae,” and
 21 together with Freddie Mac, the “Enterprises”), Fannie Mae, and JPMorgan Chase Bank,
 22 N.A.(collectively, “Plaintiffs”), and Defendant LN Management, LLC (“LN Management”)
 23 by and through their attorneys of record, hereby stipulate to extend the deadline for Plaintiffs
 24 to respond to LN Management’s Motion to Dismiss [ECF No. 20] as follows:


- 25 1. LN Management filed its Motion to Dismiss (“LN Management’s Motion”) on
 26 July 11, 2018. [ECF No. 20]. Any response is currently due on July 25, 2018.
- 27 2. The parties have agreed that more time is necessary for Plaintiffs to respond to
 28

1 LN Management’s Motion, as counsel for Plaintiffs and Defendant are both preparing for
2 trials during the time the Opposition and Reply would come due, and/or facing other
3 imminent deadlines in many other cases.

4
5 3. Based thereon, the parties agree to continue the Opposition deadline to LN
6 Management’s Motion to **August 8, 2018**.

7 This is the first request for an extension of these deadlines, and it is not made for the
8 purposes of delay. The additional time requested is to allow counsel to meaningfully respond
9 to the arguments raised in the Motion.

<p>10 DATED this 17th day of July, 2018.</p> <p>11 FENNEMORE CRAIG, P.C.</p> <p>12 <u>/s/ Leslie Bryan Hart</u></p> <p>13 Leslie Bryan Hart, Esq. Nevada Bar No. 4932 300 E. Second St. Suite 1510 Reno, NV 89501 <i>Attorney for Federal Housing Finance Agency, in its capacity as Conservator of Federal National Mortgage Association</i></p>	<p>DATED this 17th day of July, 2018.</p> <p>SMITH LARSEN & WIXOM</p> <p><u>/s/ Christopher L. Benner</u></p> <p>Kent F. Larsen, Esq. Nevada Bar No. 3463 Christopher L. Benner, Esq. Nevada Bar No. 8963 1935 Village Center Circle Las Vegas, Nevada 89134-6237 <i>Attorneys for Federal National Mortgage Association and JPMorgan Chase Bank, N.A.</i></p>
<p>17 DATED this 17th day of July, 2018.</p> <p>18 KERRY P. FAUGHNAN</p> <p>19 <u>/s/ Kerry P. Faughnan</u></p> <p>20 Kerry P. Faughnan, Esq. Nevada Bar No. 12204 P.O Box 335361 North Las Vegas, Nevada 89033 <i>Attorney for LN Management</i></p>	

23
24 **ORDER**
25 IT IS SO ORDERED:
26 
27 **RICHARD F. BOULWARE, II**
UNITED STATES DISTRICT JUDGE
28 DATED this 18th day of July, 2018.

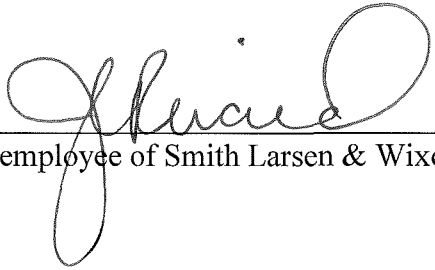
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 1, 2018 a true copy of the foregoing **Stipulation and [Proposed] Order to Extend Briefing Schedule for Defendant's Motion to Dismiss (First Request)** was filed and served via electronically via the court's CM/ECF system to the following:

Kerry P. Faughnan, Esq.
P.O Box 335361
North Las Vegas, Nevada 89033
kerry.faughnan@gmail.com
Attorney for LN Management

Asim Varma, Esq.
Howard N. Cayne, Esq.
Michael A.F. Johnson, Esq.
ARNOLD & PORTER LLP
601 Massachusetts Avenue NW
Washington, DC 20001
asim.varma@aporter.com
howard.cayne@aporter.com
michael.johnson@aporter.com

and
Leslie Bryan Hart, Esq.
Nevada Bar No. 4932
FENNEMORE CRAIG PC
300 E. Second St. Suite 1510
Reno, NV 89501
lhart@fclaw.com
pcarmon@fclaw.com
Counsel for Federal Housing Finance Agency


an employee of Smith Larsen & Wixom