

1 Joel E. Tasca  
 Nevada Bar No. 14124  
 2 Holly Ann Priest  
 Nevada Bar No. 13226  
 3 BALLARD SPAHR LLP  
 1980 Festival Plaza Drive, Suite 900  
 4 Las Vegas, Nevada 89135  
 Telephone: (702) 471-7000  
 5 Facsimile: (702) 471-7070  
 tasca@ballardspahr.com  
 6 priesth@ballardspahr.com

7 *Attorneys for Defendants Caliber Home*  
*Loans, Inc.; U.S. Bank Trust, N.A., Trustee*  
 8 *For LSF9 Master Participation Trust; Summit*  
*Real Estate Services, LLC; Joe Anderson; and*  
 9 *Mortgage Electronic Registration Systems, Inc.*

10 UNITED STATES DISTRICT COURT  
 11 DISTRICT OF NEVADA

BALLARD SPAHR LLP  
 1980 Festival Plaza Drive, Suite 900  
 Las Vegas, Nevada 89135

13 SILVIA REGINA LASKO, IMAM KEITH  
 14 ALAN LASKO, MOSQUE OF THE  
 GOLDEN RULE, and WORLDWIDE  
 15 MINISTRIES OF ISLAM,

16 Plaintiffs,

17 v.

18 CALIBER HOME LOANS, INC., et al.;

19 Defendants.

Case No.: 2:18-cv-01802-JCM-VCF

**JOINT MOTION FOR EXTENSION  
 OF TIME TO RESPOND TO  
 PLAINTIFFS' MOTIONS FOR  
 RECONSIDERATION (ECF NOS. 68  
 & 69)**

20 Pursuant to LR 7-1, Defendants U.S. Bank, N.A., as Trustee for LSF9 Master  
 21 Participation Trust ("U.S. Bank"), Caliber Home Loans, Inc. ("Caliber"), Summit Real  
 22 Estate Services, LLC ("Summit")<sup>1</sup>, Joe Anderson, and Mortgage Electronic  
 23 Registration Systems, Inc. ("MERS"), Bank of America, N.A. ("BANA"), HSBC Finance  
 24 Corporation ("HSBC") and Ocwen Financial Corporation ("Ocwen," collectively, the  
 25 "Defendants"), by and through their attorney, and hereby move the Court, pursuant  
 26 to Rule 6 of the Federal Rules of Civil Procedure, for an extension of time to respond  
 27 to Plaintiffs' Motion for Reconsideration Regarding Countrywide Home Loans and

28 \_\_\_\_\_  
<sup>1</sup> Incorrectly named Summit Financial Corp.

1 Acts of Perjury and of Fraud Upon the Court Committed by Bank of America (ECF  
2 No. 68) and Plaintiffs’ Motion for Reconsideration Regarding Default Entry and  
3 Default Judgment Against Each of These: HSBC, OCWEN Financial Corp., Caliber  
4 Home Loans, Inc. (ECF No. 69) (collectively referred to as the “Motions for  
5 Reconsideration”). In support of this Joint Motion, Defendants state as follows:

6 1. Plaintiffs filed the Motions for Reconsideration on November 27, 2018.  
7 (ECF Nos. 68 and 69). Defendants’ responsive briefs are due on or before December  
8 11, 2018.

9 2. Defendants need additional time to respond to Plaintiffs’ Motions for  
10 Reconsideration. The time within which to respond has not expired.

11 3. Defendants request an additional seven (7) days to respond to Plaintiffs’  
12 Motions for Reconsiderations (ECF Nos. 68 and 69), up to and including December  
13 18, 2018, in order to accommodate the upcoming holiday schedule, the schedule of  
14 counsel and to provide the Defendants sufficient time to review and assess Plaintiffs’  
15 Motions for Reconsiderations, including all supporting documentation (ECF Nos. 68  
16 and 69).

17 4. This joint motion is not made for the purpose of delay, and it will not  
18 prejudice the parties. The relief requested will not affect any other litigation  
19 deadlines in this case.

20 **MEMORANDUM**

21 Rule 6(b) of the Federal Rules of Civil Procedure provides that the Court may  
22 grant extensions of time at any time in its discretion for good cause shown. Where,  
23 as here, the request for extension is made prior to the expiration of the specified  
24 period of time, no finding of excusable neglect is required. Defendants respectfully  
25 submit that good cause has been shown above for an extension of time.

26 For the foregoing reasons and authorities, Defendants respectfully request  
27 that the Court grant this motion and extend Defendants’ deadline to respond to  
28

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

Plaintiffs' Motions for Reconsideration until December 18, 2018.

DATED this 4<sup>th</sup> day of December, 2018.

AKERMAN LLP

BALLARD SPAHR LLP

By: /s/ Scott R. Lachman  
Darren T. Brenner  
Nevada Bar No. 8986  
Scott R. Lachman  
Nevada Bar No. 12016  
1635 Village Center Circle,  
Suite 200  
Las Vegas, NV 89134  
Telephone: (775) 634-5000

By: /s/ Holly Ann Priest  
Joel E. Tasca  
Nevada Bar No. 14124  
Holly Ann Priest  
Nevada Bar No. 13226  
1980 Festival Plaza Drive,  
Suite 900  
Las Vegas, Nevada 89135  
Telephone: (702) 471-7000

*Attorneys Bank of America, N.A.*

*Attorneys for Defendants Caliber Home Loans, Inc.; U.S. Bank Trust, N.A., Trustee For LSF9 Master Participation Trust; Summit Real Estate Services, LLC; Joe Anderson; and Mortgage Electronic Registration Systems, Inc.*

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

GREENBERG TRAURIG, LLP

By: /s/ Maximilien D. Fetaz  
Arthur A. Zorio  
Nevada Bar No. 6547  
Maximilien D. Fetaz  
Nevada Bar No. 12737  
5371 Kietzke Lane  
Reno NV 89511  
Telephone: (775) 324-4100

By: /s/ Jacob D. Bundick  
Jacob D. Bundick  
Nevada Bar No. 9772  
Jason Hicks  
Nevada Bar No. 13149  
10845 Griffith Peak Drive,  
Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773

*Attorneys Ocwen Financial Corp.*

*Attorneys for HSBC Finance Corporation*

**IT IS SO ORDERED.**



**UNITED STATES MAGISTRATE JUDGE**

**DATED: 12-11-2018**

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that on the 4th day of December 2018, a true and  
3 correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO**  
4 **RESPOND TO PLAINTIFFS' MOTIONS FOR RECONSIDERATION (ECF NOS. 68**  
5 **& 69)**, was served on the following parties in the manner set forth below:

6 [XX] Via the Court's CM/ECF electronic service:

7 Darren T. Brenner, Esq.  
8 Scott R. Lachman, Esq.  
9 AKERMAN LLP  
10 1635 Village Center Circle, #200  
11 Las Vegas, Nevada 89134  
12 *Attorneys for Bank of America*

13 Maximilien Fetaz, Esq.  
14 Arthur A. Zorio, Esq.  
15 BROWNSTEIN HYATT FARBER SCHRECK  
16 100 N. City Parkway, Suite 1600  
17 Las Vegas, NV 89106  
18 *Attorneys for Ocwen Financial Corp.*

19 Sean K. McElenney, Esq.  
20 BRYAN CAVE LEIGHTON PAISNER LLP  
21 Two North Central Ave., #1200  
22 Phoenix, AZ 85004  
23 *Attorney for Ocwen Financial Corp. (Pro Hac Vice)*

24 Jacob D. Bundick, Esq.  
25 Jason Hicks, Esq.  
26 GREENBERG TRAUIG, LLP  
27 10845 Griffith Peak Drive, Suite 600  
28 Las Vegas, Nevada 89135  
*Attorneys for HSBC Finance Corporation*

[XX] Via U.S. Mail, postage prepaid:

Imam Keith Alan Lasko & Silvia Regina Lasko  
Mosque of the Golden Rule  
Worldwide Ministries of Islam  
8604 Vivid Violet Avenue  
Las Vegas, Nevada 89143  
*Pro Se*

/s/ C. Wells  
An Employee of BALLARD SPAHR LLP