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Goodrich v. Callville Bay Resort & Marina et al

Doc. 89

1.7

SAO 2:20-CV-00671-JCM-NJK

RESORTS, LLC., and Third-Partty Defendant MATTHIAS HORCH, by and through their attorneys of record, hereby submit this joint stipulation and order to vacate all hearing dates, trial dates and to set a status check regarding closing documents; accordingly,

IT IS HEREBY STIPULATED AND AGREED that this matter resolved between all parties and all hearing dates, including motions for summary judgment, can be vacated; and

IT IS FURTHER STIPULATED that the Court set a Date and Time for a Status Check regarding the Closing documents, in no less than 45 days.

IT IS SO STIPULATED.

DATED the 22 nd day of February 2022	DATED the 22 nd day of February 2022
HALL JAFFE & CLAYTON, LLP	RYAN ALEXANDER, CHTD.
/s/ Richard A. Englemann, Esq.	/s/ Ryan Alexander, Esq.
RICHARD A. ENGLEMANN, ESQ.	RYAN ALEXANDER, CHTD.
Nevada Bar No. 6965	Nevada Bar No. 10845
7425 Peak Drive	3017 West Charleston Boulevard, Suite 10
Las Vegas, Nevada 89128	Las Vegas, NV 89102
Attorneys for Third-Party Defendant	Attorney for Plaintiff
Matthias Horch	SHAUN GOODRICH
DATED the 22 nd day of February 2022	DATED the 22 nd day of February 2022
GIBSON ROBB & LINDH LLP	BROWNE GREEN, LLC
/s/ Marker E. Lovell, Jr.,, Esq.	/s/ Jared P. Green, Esq.
MARKER E. LOVELL, JR., ESQ.	JARED P. GREEN, ESQ.
Admitted Pro Hac Vice	Nevada Bar No. 10059
1255 Powell Street	3755 Breakthrough Way, Ste. 210
Emeryville, CA 94608	Las Vegas, NV 89135
Attorneys for Defendant/Third-Party	Attorneys for Defendant/Third-Party
Defendants	Defendants
CALLVILLE BAY RESORT & MARINA	CALLVILLE BAY RESORT & MARINA
and FOREVER RESORTS, LLC	and FOREVER RESORTS, LLC

1 SAO 2:20-CV-00671-JCM-NJK 2 **ORDER** 3 Based on the foregoing STIPULATION OF THE PARTIES, 4 5 IT IS HEREBY ORDERED that all hearing dates, including motions for summary 6 judgment, are vacated; and 7 IT IS FURTHER ORDERED that a Status Report regarding the Closing Documents 8 is due no later than 45 days from the date of this order. 9 Dated: February 18, 2022. 10 Cellus C. Mahan 11 UNIFED STATES DISTRICT JUDGE 12 Submitted by: 13 HALL JAFFE & CLAYTON, LLP 14 /s/ Richard A. Englemann, Esq. 15 RICHARD A. ENGLEMANN, ESQ. 16 Nevada Bar No. 6965 17 7425 Peak Drive Las Vegas, Nevada 89128 18 Attorneys for Third Party Defendant Matthias Horch 19 20 21 22 23 24 25 26 27 28

Shayna Ortega-Rose

From: Jared Green <jared@bgtriallawyers.com>
Sent: Friday, February 18, 2022 8:40 AM

To: Shayna Ortega-Rose; Richard Englemann; Marker Lovell

Cc: ryan@ryanalexander.us; Noah Cicero; Shayna Ortega-Rose; Erika Parker

Subject: Re: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Yes.

Get Outlook for iOS

From: Shayna Ortega-Rose <srose@lawhjc.com> Sent: Friday, February 18, 2022 8:38:36 AM

To: Richard Englemann < Renglemann@lawhjc.com>; Marker Lovell < mlovell@gibsonrobb.com>; Jared Green

<jared@bgtriallawyers.com>

Cc: ryan@ryanalexander.us <ryan@ryanalexander.us>; Noah Cicero <Ncicero@lawhjc.com>; Shayna Ortega-Rose

<srose@lawhjc.com>; Erika Parker <eparker@lawhjc.com>

Subject: RE: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Thank you, Mr. Lovell and Mr. Alexander for approval for e-signature on the attached.

Mr. Green do I have approval for your e-signature on the attached?

Thank you.

Shayna Ortega-Rose | Legal Assistant Richard A. Englemann, Esq. Jan K. Tomasik, Esq.



7425 Peak Drive Las Vegas, NV 89128 Phone: 702.316.4111 x119 Fax: 702.316.4114

Email: srose@lawhic.com

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From: Richard Englemann < Renglemann@lawhjc.com>

Sent: Thursday, February 17, 2022 1:50 PM

To: Marker Lovell <mlovell@gibsonrobb.com>; 'Jared@bgtriallawyers.com' <jared@bgtriallawyers.com> **Cc:** ryan@ryanalexander.us; Shayna Ortega-Rose <srose@lawhjc.com>; Noah Cicero <Ncicero@lawhjc.com>

Subject: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Counsel, because of the motions for summary judgment and to keep the settlement on track, I like submitting a stipulation and order to the court to vacate all the hearing dates and to set the matter for a status check regarding the closing documents.

Please find attached the SAO. Please advise is we have your authorization to add your signature.

Sincerely,

Richard A. Englemann, Esq.

Of Counsel

HALL JAFFE & CLAYTON, LLP



7425 Peak Drive Las Vegas, NV 89128 Phone: 702.316.4111 x125

Fax: 702.316.4114

Email: Renglemann@lawhjc.com

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Shayna Ortega-Rose

From: Marker Lovell <mlovell@gibsonrobb.com>
Sent: Thursday, February 17, 2022 2:21 PM

To: Richard Englemann; 'Jared@bgtriallawyers.com'

Cc: ryan@ryanalexander.us; Shayna Ortega-Rose; Noah Cicero

Subject: RE: [DKIM Permanent Error] SAO to vacate hearing dates. Goodrich v. Callville Bay and

Callville Bay v. Horch

Ok with us.

From: Richard Englemann < Renglemann@lawhjc.com>

Sent: Thursday, February 17, 2022 1:50 PM

To: Marker Lovell <mlovell@gibsonrobb.com>; 'Jared@bgtriallawyers.com' <jared@bgtriallawyers.com> **Cc:** ryan@ryanalexander.us; Shayna Ortega-Rose <srose@lawhjc.com>; Noah Cicero <Ncicero@lawhjc.com>

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Sincerely,

Richard A. Englemann, Esq.

Of Counsel

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Shayna Ortega-Rose

From: Ryan Alexander <ryan@ryanalexander.us>
Sent: Thursday, February 17, 2022 1:59 PM

To: Richard Englemann

Cc: Jared@bgtriallawyers.com; Jennifer Lee; Marker Lovell; Noah Cicero; Shayna Ortega-

Rose

Subject: Re: SAO to vacate hearing dates. Goodrich v. Callville Bay and Callville Bay v. Horch

Thank you Richard, you may e sign for me.

Ryan

On Thu, Feb 17, 2022 at 1:50 PM Richard Englemann < Renglemann@lawhjc.com > wrote:

Counsel, because of the motions for summary judgment and to keep the settlement on track, I like submitting a stipulation and order to the court to vacate all the hearing dates and to set the matter for a status check regarding the closing documents.

Please find attached the SAO. Please advise is we have your authorization to add your signature.

Sincerely,

Richard A. Englemann, Esq.

Of Counsel

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