

1 MELANIE D. MORGAN, ESQ.
2 Nevada Bar No. 8215
3 DONNA M. WITTIG, ESQ.
4 Nevada Bar No. 11015
5 SCOTT R. LACHMAN, ESQ.
6 Nevada Bar No. 12016
7 **AKERMAN LLP**
8 1635 Village Center Circle, Suite 200
9 Las Vegas, Nevada 89134
10 Telephone: (702) 634-5000
11 Facsimile: (702) 380-8572
12 Email: melanie.morgan@akerman.com
13 Email: donna.wittig@akerman.com
14 Email: scott.lachman@akerman.com

15 *Attorneys for Nationstar Mortgage LLC*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 WAYNE A. HAGENDORF,
19 Plaintiff,
20 v.
21 NATIONSTAR MORTGAGE LLC,
22 Defendant.

23 Case No.: 2:21-cv-00231-GMN-BNW

24 **AMENDED STIPULATION AND ORDER
FOR EXTENSION OF RESPONSIVE
PLEADING DEADLINE**

25 **[FIRST REQUEST]**

26 Nationstar Mortgage LLC and Wayne A. Hagendorf stipulate to extend the responsive
27 pleading deadline. Hagendorf filed his complaint on February 12, 2021. ECF No. 1. Nationstar was
28 served with the complaint on February 17, 2021. Nationstar's deadline to respond to the complaint
was March 10, 2021. The parties agree Nationstar shall have until **Monday, April 26, 2021** to file a
response to the complaint. Nationstar will use this additional time to review the loan documents
applicable to this case.

29 Nationstar and Hagendorf acknowledge this stipulation is being filed after the March 10
30 deadline. Nationstar communicated with Hagendorf prior to the deadline, reaching out on March 8,
31 2021, to request a stipulated extension. At that time, Nationstar was still within its answering
32 deadline and thus did not consider excusable neglect standard in the request or in drafting the
33 stipulation to extend. By way of further explanation, counsel for Nationstar initially requested its

1 extension from counsel for Hagendorf for "personal reasons." Those reasons are medical issues
2 undersigned counsel is dealing with that has required extended time away from the office which in
3 turn required a longer time to review the loan documents in this case, as stated in the parties' initial
4 stipulation to extend as the basis for the extension. Shortly thereafter, this case was internally
5 transferred to another Akerman associate to take over handling of the case as a result of undersigned
6 counsels' ongoing medical treatment. Respectfully, the failure to file this stipulation prior to the
7 March 10 deadline is a result of oversight constituting excusable neglect. LR IA 6-1(a). Neither
8 Nationstar nor Hagendorf will be prejudiced by the brief extension.

9 This is the first request for an extension of this deadline and is made in good faith without the
10 purpose of undue delay.

11 DATED April 22, 2021.

12	AKERMAN LLP	13	FREEDOM LAW FIRM
	<u>/s/ Donna M. Wittig</u>		<u>/s/ George Haines</u>
14	MELANIE D. MORGAN, ESQ.		GEORGE HAINES, ESQ.
15	Nevada Bar No. 8215		Nevada Bar No. 9411
16	DONNA M. WITTIG, ESQ.		Beltway Corporate Center
17	Nevada Bar No. 11015		8985 South Eastern Avenue, Suite 350
18	SCOTT R. LACHMAN, ESQ.		Las Vegas, Nevada 89123
	Nevada Bar No. 12016		<i>Attorney for Wayne A. Hagendorf</i>
	1635 Village Center Circle, Suite 200		
	Las Vegas, Nevada 89134		
	<i>Attorneys for Nationstar Mortgage LLC</i>		

20 IT IS SO ORDERED.

21 

22
23 UNITED STATES MAGISTRATE JUDGE

24 April 26, 2021

25 DATED: _____