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 12 *Consultants, LLC, and Rene Richardson*

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

16 UNITED STATES OF AMERICA *ex rel.*
 17 PEGGY THORNTON, Realtor,

18 and

19 PEGGY THORNTON,
 20 Plaintiff,

21 vs.

22 PORTOLA DEL SOL OPERATOR, LLC, a
 foreign limited-liability company; TMIF II
 23 PORTOLA, LLC, a foreign limited-liability
 company; APARTMENT MANAGEMENT
 24 CONSULTANTS, LLC, a foreign limited
 liability company; and RENE
 25 RICHARDSON, as AGENT of PORTOLA
 DEL SOL OPERATOR, LLC,

26 Defendants.
 27
 28

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline
 For Defendants Apartment Management
 Consultants, LLC and Rene Richardson to
 Respond to the Second Amended
 Complaint**

(First Request)

1 Relator Peggy Thornton and Defendants Apartment Management Consultants, LLC and
2 Rene Richardson (collectively “AMC”), by and through their respective undersigned counsel,
3 hereby stipulate to extend AMC’s deadline to respond to Ms. Thornton’s Second Amended
4 Complaint (“SAC”) by three weeks, to and including **October 29, 2024**, with the following
5 background and reasons:

6 1. Ms. Thornton filed her SAC on September 24, 2024. ECF No. 108.

7 2. Under FRCP 15, AMC’s response to the SAC is therefore due on October 8, 2024.

8 3. AMC requires additional time to assess the SAC in light of the multiple rounds of
9 motion-to-dismiss briefing filed thus far. Additionally, AMC’s counsel have both been traveling
10 the past several weeks for out-of-state hearings, depositions, and meetings, and Attorney Gil
11 Kahn is currently observing the Jewish High Holidays.

12 4. The requested extension will not cause undue delay given that it mirrors the
13 extension that AMC and co-defendant TMIF have separately stipulated to (ECF No. 110), and
14 this Court recently granted the stipulation staying discovery in this matter until any challenges to
15 the SAC are resolved. ECF No. 109.

16 **IT IS SO STIPULATED.**

17
18 Dated: October 8, 2024.

Dated: October 8, 2024.

19 SNELL & WILMER L.L.P.

NEVADA LEGAL SERVICES

20 By: /s/ Gil Kahn

By: /s/ Kristopher Pre

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28 *Management Consultants, LLC and Rene*
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ORDER

Good cause appearing, Ms. Thornton and AMC’s stipulation is **GRANTED**. AMC’s deadline to respond to the Second Amended Complaint is extended to and including October 29, 2024.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 10/9/2024

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **Stipulation and Order to Extend Deadline For Defendants Apartment Management Consultants, LLC and Rene Richardson to Respond to the Second Amended Complaint** by method indicated below:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court’s Service List for the above-referenced case.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED October 8, 2024

/s/ Tiy Lewis
An employee of SNELL & WILMER L.L.P.

4882-2222-0269