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11 *Attorneys for Defendants Apartment Management*
 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, Relator,

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.
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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**

(Fourth 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 two weeks, to and including **December 10, 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 was therefore due on October 8,
8 2024.

9 3. The Parties stipulated to grant AMC an additional three weeks to assess the SAC
10 given the multiple rounds of motion-to-dismiss briefing filed thus far and in light of AMC’s
11 counsels’ conflicting work travel. ECF No. 113. This extension also mirrored the one granted to
12 co-defendant TMIF. ECF No. 110.

13 4. The Parties subsequently stipulated to grant AMC an additional two weeks to
14 respond to the SAC due to unexpected scheduling conflicts, primarily including unexpectedly
15 advanced deadlines in a federal pro bono trial. ECF No. 115.

16 5. During the intervening period, Ms. Thornton and AMC engaged in renewed
17 settlement discussions.

18 6. Because the United States required additional time to review a settlement offer, as
19 required under the False Claims Act, Ms. Thornton and AMC stipulated to extend AMC’s time to
20 answer or otherwise respond to the SAC by two weeks, until November 26, 2024. ECF Nos.
21 118-19.

22 7. The United States has subsequently requested an additional two weeks to review
23 the settlement offer, in part due to the upcoming Thanksgiving holiday.

24 8. Because preventing AMC from expending additional attorney’s fees to respond to
25 the SAC during that period would be conducive to settlement, the parties agree it is in their
26 mutual best interest and judicial economy to likewise extend that response period by two weeks,
27 to and until December 10, 2024.
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9. The Parties agree that this stipulation is entered into in good faith and will not unduly delay proceedings.

IT IS SO STIPULATED.

Dated: November 25, 2024.

SNELL & WILMER L.L.P.

By: /s/ Gil Kahn

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*Attorneys for Defendant Apartment
Management Consultants, LLC and Rene
Richardson*

Dated: November 25, 2024.

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By: /s/ Elizabeth S. Carmona

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Attorneys for Relator

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 December 10, 2024.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 11/26/2024

1 CERTIFICATE OF SERVICE

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

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

22 DATED November 25, 2024

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

25 4876-6853-6055