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7 *Attorneys for Defendant TMIF II Portola, LLC*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA
 11 ex rel. PEGGY THORNTON, Relator,

12 and

13 PEGGY THORNTON,

14 Plaintiff,

15 vs.

16 PORTOLA DEL SOL OPERATOR, LLC,
 17 a foreign limited-liability company; TMIF
 18 II PORTOLA, LLC, a foreign limited liability
 19 company; APARTMENT MANAGEMENT
 20 CONSULTANTS, LLC, a foreign limited
 liability company, and RENE RICHARDSON,
 as AGENT of PORTOLA DEL SOL
 OPERATOR, LLC,

21 Defendants.

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

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO FILE
 RESPONSIVE PLEADINGS TO FIRST
 AMENDED COMPLAINT**

[First Request]

22 Plaintiff Peggy Thornton (“Thornton”) (collectively “Plaintiff”), Defendant TMIF II
 23 Portola, LLC (“TMIF”), by and through their undersigned attorneys, and pursuant to LR IA 6-1,
 24 submit the following Stipulation to Extend Time to File Responsive Pleadings to the First Amended
 25 Complaint (“FAC”) up to and including January 19, 2024. In support of the Stipulation, the parties
 26 state the following:

- 27 1. TMIF’s responsive pleading to Plaintiff’s FAC is currently due December 22, 2023.

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2. Because counsel for TMIF is currently in trial in another matter and due to the impending holidays, Plaintiff requested a four-week extension until January 19, 2024.

3. Counsel for Plaintiff has agreed to the requested extension and the requested extension will not impact any other deadlines in this case.

4. This is the first request to extend the deadline for TMIF to file their responsive pleading to Plaintiff's FAC.

5. This request for an extension of time is not intended to cause any undue delay or prejudice to any party.

6. Therefore, the Parties hereby stipulate that the deadline for TMIF to file their responsive pleadings shall be extended through January 19, 2024.

Dated this 21st day of December, 2023.

NEVADA LEGAL SERVICES, INC.

McDONALD CARANO LLP

By: /s/ Peter C. Wetherall
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Attorneys for Plaintiffs

Attorneys for Defendant TMIF II Portola, LLC

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 12/22/2023