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5 (Admitted *pro hac vice*)

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10 Attorneys for Defendant  
11 Quail Valley Water District

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HILLCREST INVESTMENTS, LTD., a  
11 foreign corporation; HILLCREST  
12 PROJECTS, LLC., a foreign limited liability  
13 company;

Case No. 2:22-cv-00406-RFB-VCF

**STIPULATION AND ORDER TO EXTEND  
TIME FOR DEFENDANT TO RESPOND TO  
COMPLAINT  
(Fourth Request)**

Plaintiffs,

v.

CHICAGO TITLE INSURANCE  
15 COMPANY, a foreign entity; QUAIL  
16 VALLEY WATER DISTRICT, a foreign  
17 entity; 11239, LLC, a foreign entity;  
R.A.M.M. CORP., a Nevada Corporation;

Defendants.

Defendant, Quail Valley Water District, (“Defendant”) by and through its counsel of record, Daniel N. Raytis, Esq., of Belden Blaine Raytis, LLP (admitted *pro hac vice*) and Plaintiffs, Hillcrest Investments, Ltd. and Hillcrest Projects, LLC (“Plaintiffs”), by and through their counsel of record, Mitchell S. Bisson, Esq., hereby jointly submit this stipulation and order to extend Defendant’s deadline to file its response to the Complaint (ECF No. 1, served on April 20, 2022), to thirty (30) days after entry of this Order.

This is the parties’ fourth request for an extension of this deadline and is not intended to cause any delay or prejudice to any party.

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1       Defendant is an out-of-state entity. Defendant's counsel was permitted to appear *pro hac*  
2 *vice* in this matter by an Order of the Court on June 15, 2022. The parties request this extension in  
3 order to provide Defendant with additional time to obtain documents, materials and information  
4 relevant to Plaintiff's claims alleged against Defendant in order to respond to the Complaint and/or  
5 discuss settlement of the same.

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7 Dated: September 12, 2022

BELDEN BLAINE RAYTIS, LLP

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By: /s/Daniel N. Raytis  
DANIEL N. RAYTIS  
Attorneys for Defendant Quail Valley  
Water District

THE LAW OFFICES OF MITCHELL  
S. BISSON

By: /s/Mitchell S. Bisson  
MITCHELL S. BISSON, ESQ.  
Attorney for Plaintiffs

**ORDER**

Based upon the stipulation of the parties, and good cause appearing,

**IT IS SO ORDERED.** IT IS FURTHER ORDERED that the response to the complaint must  
be filed on or before October 19, 2022.

Dated this 19<sup>th</sup> day of September, 2022.



UNITED STATES MAGISTRATE JUDGE  
Case No. 2:22-cv-00406-RFB-VCF

1 Case No. 22:cv-00406

2 **PROOF OF SERVICE**

3 STATE OF CALIFORNIA, COUNTY OF KERN

4 I am employed in the County of Kern, State of California. I am over the age of eighteen  
years and not a party to the within action; my business address is 5016 California Ave., Suite 3,  
Bakersfield, CA 93309. My email address is [heather@bbr.law](mailto:heather@bbr.law).

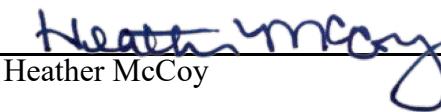
5 On **September 12, 2022**, I served the following document(s) described as

6 on the interested parties in this action via electronic service through the Court's Electronic  
7 File/Service Program.

8 Mithcell S. Bisson, Esq. 9 Law Office of Mitchell S. Bisson 911 N. Buffalo Drive, Suite 201 10 Las Vegas, NV 89128 <a href="mailto:mbisson@bissonlegal.com">mbisson@bissonlegal.com</a>	11 Attorney for Plaintiffs Hillcrest 12 Investments, LTD
13 Natalie C. Lehmana, Esq. Fidlity National Law Group 8363 W. Sunset Road, Ste. 120 Las Vegas, NV 89113 <a href="mailto:Natalie.lehman@fnf.com">Natalie.lehman@fnf.com</a>	14 Attorneys for Defendant Chicago Title 15 Insurance Company

16 Executed on **September 12, 2022**, at Bakersfield, California.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
18 true and correct.

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Heather McCoy