

1 Daniel N. Raytis, California SBN 218374

2 [dan@bbr.law](mailto:dan@bbr.law)

3 BELDEN BLAINE RAYTIS, LLP

4 5016 California Avenue, Suite 3

5 Bakersfield, California 93309

6 Telephone: (661) 864-7827

7 Facsimile: (661) 878-9797

8 (Admitted *pro hac vice*)

9 Attorneys for Defendant

10 Quail Valley Water District

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 HILLCREST INVESTMENTS, LTD., a  
14 foreign corporation; HILLCREST  
15 PROJECTS, LLC., a foreign limited liability  
16 company;

17 Plaintiffs,

18 v.

19 CHICAGO TITLE INSURANCE  
20 COMPANY, a foreign entity; QUAIL  
21 VALLEY WATER DISTRICT, a foreign  
22 entity; 11239, LLC, a foreign entity;  
23 R.A.M.M. CORP., a Nevada Corporation;

24 Defendants.

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

25 **STIPULATION AND ORDER TO EXTEND  
26 TIME FOR DEFENDANT TO RESPOND TO  
27 COMPLAINT  
28 (Fourth Request)**

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

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

37 ///

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.

6  
7 Dated: September 12, 2022

BELDEN BLAINE RAYTIS, LLP

8  
9 By: /s/Daniel N. Raytis  
10 DANIEL N. RAYTIS  
11 Attorneys for Defendant Quail Valley  
12 Water District

13 Dated: September 12, 2022

14 THE LAW OFFICES OF MITCHELL  
15 S. BISSON

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

19 **ORDER**

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

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

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

24   
25 **UNITED STATES MAGISTRATE JUDGE**  
26 **Case No. 2:22-cv-00406-RFB-VCF**  
27  
28

Case No. 22:cv-00406

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF KERN

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.

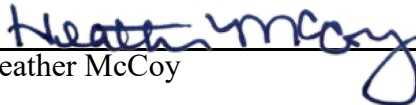
On **September 12, 2022**, I served the following document(s) described as

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

Mithcell S. Bisson, Esq. Law Office of Mitchell S. Bisson 911 N. Buffalo Drive, Suite 201 Las Vegas, NV 89128 <a href="mailto:mbisson@bissonlegal.com">mbisson@bissonlegal.com</a>	Attorney for Plaintiffs Hillcrest Investments, LTD
Natalie C. Lehman, Esq. Fidelity 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>	Attorneys for Defendant Chicago Title Insurance Company

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

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

  
Heather McCoy