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9 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
(Sixth 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 twenty-one (21) days after entry of this Order.

This is the Parties’ sixth and final request for an extension of Defendant’s response deadline. Plaintiffs and Defendant remain engaged in good faith resolution discussions. This Stipulation is for

1 the purpose of facilitating efforts related thereto, and is not intended to cause any delay or prejudice
2 to any party.

3 Moreover, Defendant is an out-of-state entity. Defendant's counsel was permitted to appear
4 *pro hac vice* in this matter by an Order of the Court on June 15, 2022. Additionally, Plaintiffs and
5 their representatives reside and are located in different areas throughout both the United States and
6 Canada. Thus, the parties request this final extension in order to allow Plaintiffs and Defendant
7 sufficient time to obtain necessary documents, materials, and information relevant to Plaintiffs'
8 claims alleged against Defendant in order to respond to the Complaint or finalize resolution of the
9 same. The Parties represent that they intend to work in good faith with each other in order to
10 hopefully resolve this dispute prior to the pleading deadline. Nothing herein shall serve to waive or
11 relinquish any right held by Defendant to file any necessary responsive pleading or motion to address
12 Plaintiff's Complaint at or before the responsive pleading deadline reset pursuant to this Joint
13 Stipulation and this Court's Order.

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15 Dated: November 16, 2022

BELDEN BLAINE RAYTIS, LLP

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

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Dated: November 16, 2022

THE LAW OFFICES OF MITCHELL
S. BISSON

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

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ORDER

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

3 IT IS SO ORDERED.

4 Dated this 16th day of November, 2022.

6 No further extensions will be granted.

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
5 years and not a party to the within action; my business address is 5016 California Ave., Suite 3,
6 Bakersfield, CA 93309. My email address is heather@bbr.law.

7 On **November 16, 2022**, I served the following document(s) described as

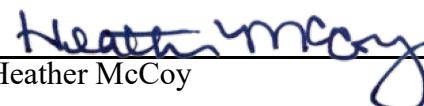
8 **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT TO
9 RESPOND TO COMPLAINT (Sixth Request)**

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

12 Mitchell S. Bisson, Esq. 13 Law Offices of Mitchell S. Bisson 14 911 N. Buffalo Drive, Suite 201 15 Las Vegas, CA 89128 mbisson@bissonlegal.com	16 Attorney for Plaintiffs Hillcrest 17 Investments, LTD
18 Natalie C. Lehman, Esq. 19 Fidelity National Law Group 20 8363 W. Sunset Road, Suite 120 21 Law Vegas, NV 89113 Natalie.lehman@fnf.com	22 Attorneys for Defendant Chicago 23 Title Insurance Company

24 Executed on **November 16, 2022**, at Bakersfield, California.

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

27 
28 Heather McCoy
Heather McCoy