

1 VANESSA M. TURLEY, ESQ.
 Nevada Bar No. 14635
 2 **TROUTMAN PEPPER HAMILTON SANDERS LLP**
 8985 S. Eastern Ave., Ste. 200
 3 Las Vegas, NV 89123 (*Nevada Office*)
 Tele: (470) 832-5572
 4 Fax: (404) 962-6800
vanessa.turley@troutman.com

5 **TROUTMAN PEPPER HAMILTON SANDERS LLP**
 600 Peachtree St. NE #3000
 Atlanta, GA 30308 (*Corporate Office*)
 7 *Attorneys for Defendant Nationstar*
 8 *Mortgage LLC, dba Mr. Cooper and Federal*
 9 *National Mortgage Association*

10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 SFR INVESTMENTS POOL 1, LLC,
 13

14 Plaintiff,
 15

16 vs.

17 NATIONSTAR MORTGAGE, LLC d/b/a
 MR. COOPER; FEDERAL NATIONAL
 18 MORTGAGE ASSOCIATION; DOES I
 through X; and ROE BUSINESS ENTITIES
 19 I through X, inclusive,

20 Defendants.
 21

Case No. 2:22-cv-00534-GMN-NJK

**STIPULATION AND ORDER TO EXTEND
 DEADLINES**

(SECOND REQUEST)

22 Plaintiff, SFR Investments Pool 1, LLC (“SFR”) and Defendants, Nationstar Mortgage, LLC d/b/a
 23 Mr. Cooper (“Nationstar”) and Federal National Mortgage Association (“Fannie Mae”) (collectively, the
 24 “Parties”), by and through their undersigned counsel, hereby stipulate and agree to extend the date for
 25 Nationstar and Fannie Mae to file a response to SFR’s Complaint [ECF No. 1]. The Parties further stipulate
 26 and agree that the foreclosure sale on the subject property be postponed until this Court rules on SFR’s
 27 Emergency Motion for Temporary Restraining Order and Preliminary Injunction (“Motion”) [ECF No.’s
 28 7, 8]. In support of the stipulation, the Parties state as follows:

- 1 1. On March 28, 2022, SFR Investments Pool 1, LLC (“SFR”) filed the Complaint in the
2 instant matter. [ECF No 1].
- 3 2. On March 30, 2022, SFR filed an Emergency Motion for Temporary Restraining Order
4 and Preliminary Injunction (“Motion”). [ECF No. 7, 8].
- 5 3. On April 1, 2022, this Court entered a minute order in chambers setting a deadline for
6 Defendants to respond to the Motion no later than Monday, April 4, 2022 at 5:00 p.m. and
7 further ordering an in person hearing on the Motion for Tuesday, April 5, 2022, at 3:00
8 p.m. [ECF No. 8].
- 9 4. On April 4, 2022, this Court entered an order extending the deadline for Defendants to
10 respond to the motion for preliminary injunction to April 13, 2022 and setting the deadline
11 for SFR to file a reply in support of its motion for April 20, 2022. [ECF No. 12].
- 12 5. On April 15, 2022, this Court entered an order extending the deadline for Defendants to
13 respond to the motion for preliminary injunction and file a responsive pleading to SFR’s
14 Complaint to May 4, 2022. The Order further allowed the Motion to be briefed in the
15 normal course pursuant to LR 7-2. [ECF No. 14].
- 16 6. On June 7, 2022, this Court entered an order extending the deadline for Defendants to
17 respond to the motion for preliminary injunction and file a responsive pleading to SFR’s
18 Complaint to June 24, 2022. The Order further declared that SFR shall have seven days
19 after service of Defendants’ Response to file a reply in support of its Motion. [ECF No.
20 16].
- 21 7. Defendants filed its Opposition to the Motion for Preliminary Injunction on June 24, 2022.
22 [ECF No. 17].
- 23 8. On June 29, 2022, this Court entered an order extending the deadline for Defendants to file
24 a responsive pleading to SFR’s Complaint to July 22, 2022. [ECF No. 19]
- 25 9. SFR to filed its Reply in Support of its Motion for Preliminary Injunction on July 7, 2022.
26 [ECF No. 20].
- 27 10. Defendants agree to refrain from setting the foreclosure sale of the real property located at
28

1 **6171 Fox Creek, Las Vegas, NV 89122, Parcel No. 161-15-212-175** until such time as
2 this Court rules on the Motion. The Motion is now fully briefed.

3 11. Finally, the Parties agree that Defendants shall have until August 19, 2022, to file a
4 response to SFR's Complaint.

5 12. Both parties represent this stipulation is not made with any intent to delay or prejudice
6 either party.

8 DATED this 25th day of July, 2022.

9 **TROUTMAN PEPPER HAMILTON SANDERS LLP**

10 /s/ Vanessa M. Turley

11 Vanessa M. Turley, Esq.
12 Nevada Bar No. 14635
13 8985 S. Eastern Avenue, Suite 200
14 Las Vegas, NV 89123

15 *Counsel for Nationstar Mortgage, LLC
16 dba Mr. Cooper and Federal National
17 Mortgage Association*

8 DATED this 25th day of July, 2022.

9 **HANKS LAW GROUP**

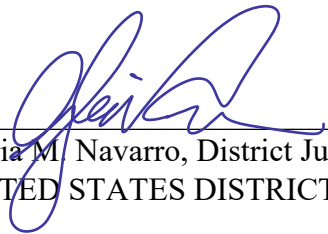
10 /s/ Chantel M. Schimming

11 Chantel M. Schimming, Esq.
12 Nevada Bar No. 8886
13 7625 Dean Martin Drive, Suite 110
14 Las Vegas, NV 89139

15 *Counsel for SFR Investments Pool 1, LLC*

18 **IT IS SO ORDERED.**

19 Dated this 28 day of July, 2022.

20 
21 _____
22 Gloria M. Navarro, District Judge
23 UNITED STATES DISTRICT COURT

Duarte, Evelyn S.

From: Turley, Vanessa M.
Sent: Tuesday, July 26, 2022 3:18 PM
To: Duarte, Evelyn S.
Subject: FW: Pagua / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]
Attachments: SAO to Extend Response Deadlines Pagua_ 6171 Fox Creek 2nd Request (SFR edits).docx

Vanessa M. Turley
Attorney
troutman pepper
Direct: 470.832.5572
vanessa.turley@troutman.com

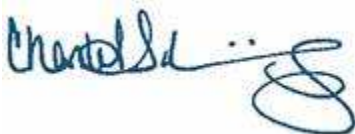
From: Chantel Schimming <chantel@hankslg.com>
Sent: Friday, July 22, 2022 5:50 PM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Karen Hanks <karen@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]

EXTERNAL SENDER

See attached a redlined copy of the SAO. I made a few edits. I believe the MTRO/PI has been fully briefed and the SAO is just for an extension of the responsive pleading deadline, correct? Also, I added Fannie Mae as a party you represent and as a party in parts of the body where Fannie Mae was left out.

With these redlined changes, you can file with my e-signature.

Thanks,
Chantel



Chantel M. Schimming, Esq.
Associate Attorney

HANKS LAW GROUP
7625 Dean Martin Drive, Suite 110
Las Vegas, Nevada 89139

Telephone: (702) 758-8434
Facsimile: (725) 239-3415

mail to: chantel@hankslg.com <http://www.hankslg.com>

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From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Friday, July 22, 2022 2:14 PM
To: Karen Hanks <karen@hankslg.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek -SAO to extend deadline to file Responsive Pleading to Complaint [Second Request]

Hi Karen and Chantel,

Attached is the stipulation and order. Please let me know if I may submit with your e-signature.

Thanks and have a good weekend!

Vanessa M. Turley
Attorney
troutman pepper
Direct: 470.832.5572
vanessa.turley@troutman.com

From: Karen Hanks <karen@hankslg.com>
Sent: Thursday, July 21, 2022 1:17 PM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek - Original Collateral File

EXTERNAL SENDER

I have not. Let's stipulate and I'll look at it this week or next.



Karen L. Hanks, Esq.
7625 Dean Martin Drive, Ste 110
Las Vegas, Nevada 89139
702-758-8434
www.hankslg.com

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Thursday, July 21, 2022 12:53 PM
To: Karen Hanks <karen@hankslg.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek - Original Collateral File

Hi Karen,

I was wondering if you were able to look into the below. If not, I can draft and Stip and Order to extend the responsive pleading date.

Thanks,

Vanessa M. Turley
Attorney
troutman pepper
Direct: 470.832.5572
vanessa.turley@troutman.com

From: Karen Hanks <karen@hankslg.com>
Sent: Tuesday, July 19, 2022 9:31 AM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek - Original Collateral File

EXTERNAL SENDER

Let me look into it. Might not be until a little later today though. Either way, if need be we can extend the responsive pleading date again.



Karen L. Hanks, Esq.
7625 Dean Martin Drive, Ste 110
Las Vegas, Nevada 89139
702-758-8434
www.hankslg.com

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Tuesday, July 19, 2022 8:48 AM
To: Karen Hanks <karen@hankslg.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek - Original Collateral File

Hi Karen,

I just left you a voicemail on this file. Our responsive pleading is due July 22 and we are awaiting a hearing date for the Motion for Preliminary Injunction. The Complaint contains the note-based allegations we discussed over the phone last week.

Do you want to do a Stip and Order to file an Amended Complaint? Let me know or just send it over. Also, happy to discuss at 702-349-7748.

Thank you,

Vanessa M. Turley
Attorney
troutman pepper
Direct: 470.832.5572
vanessa.turley@troutman.com

From: Karen Hanks <karen@hankslg.com>
Sent: Monday, July 11, 2022 1:38 PM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>; Chantel Schimming <chantel@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: RE: Pagua / 6171 Fox Creek - Original Collateral File

EXTERNAL SENDER

Paige,

Not producing the note was just one of the violations of NRS 107.200 and 210. We did not plead a separate claim for failing to produce the note. Even if we had, complying after we file suit wouldn't be grounds to dismiss a claim. We still have the damages that flowed from the failure.

But thanks. I don't know that we need to inspect the original, but if we do, I'll contact McCarthy.



Karen L. Hanks, Esq.
7625 Dean Martin Drive, Ste 110
Las Vegas, Nevada 89139

702-758-8434

www.hankslg.com

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Monday, July 11, 2022 12:32 PM
To: Chantel Schimming <chantel@hankslg.com>; Karen Hanks <karen@hankslg.com>
Cc: STAFF HANKSLG <staff@hankslg.com>; Balser, Justin D. <Justin.Balser@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Llarena, Carla D. <Carla.Llarena@troutman.com>
Subject: Pagua / 6171 Fox Creek - Original Collateral File

Hi Chantel & Karen,

We have been notified that the original collateral file for Pagua has been delivered locally to McCarthy Holthus.

I have attached the file for your review. However, if you would like to inspect the original Note at their office, you may make an appointment at McCarthy Holthus.

In light of the same, we would request that you dismiss the claims in the Complaint relating to the Note. We would also entertain any settlement offer your client wishes to provide.

Thank you,

Vanessa M. Turley

Attorney

Direct: 470.832.5572

vanessa.turley@troutman.com

troutman pepper

c/o 600 Peachtree Street, NE, Suite 3000

Atlanta, GA 30308

troutman.com

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