

1 ARIEL E. STERN, ESQ.  
2 Nevada Bar No. 8276  
3 NATALIE L. WINSLOW, ESQ.  
4 Nevada State Bar. 12125  
5 PAIGE L. MAGASTER, ESQ.  
6 Nevada Bar No. 15557  
7 AKERMAN LLP  
8 1635 Village Center Circle, Suite 200  
9 Las Vegas, Nevada 89134  
10 Telephone: (702) 634-5000  
11 Facsimile: (702) 380-8572  
12 Email: ariel.stern@akerman.com  
13 Email: natalie.winslow@akerman.com  
14 Email: paige.magaster@akerman.com

15 *Attorneys for NewRez LLC f/k/a New Penn  
16 Financial, LLC, d/b/a Shellpoint Mortgage  
17 Servicing*

18 **UNITED STATES DISTRICT COURT**  
19 **DISTRICT OF NEVADA**

20 COLLEGIUM FUND LLC SERIES #31, a  
21 Nevada limited liability company,

22 Case No. 2:22-cv-00678-RFB-BNW

23 Plaintiff,  
24 v.

25 **STIPULATION AND ORDER FOR  
26 EXTENSION OF TIME TO RESPOND TO  
27 COMPLAINT**

28 NEWREZ LLC F/K/A NEW PENN  
1 FINANCIAL, LLC, D/B/A SHELLPOINT  
2 MORTGAGE SERVICING; QUALITY LOAN  
3 SERVICE CORPORATION; DOE individuals I  
4 through XX; and ROE CORPORATIONS I  
5 through XX,

6 **(FOURTH REQUEST)**

7 Defendants.

8 Plaintiff Collegium Fund LLC Series #31, and Defendant NewRez LLC f/k/a New Penn  
9 Financial, LLC, d/b/a Shellpoint Mortgage Servicing, hereby stipulate and agree that Shellpoint shall  
10 have an additional seven (7) days, up to and including **August 8, 2022**, to file its response to the  
11 plaintiff's complaint, which is currently due on August 1, 2022. The complaint was filed in state  
12 court on March 16, 2022, and the parties entered into an agreement on April 18, 2022, to extend  
13 Shellpoint's time to respond to the complaint until May 16, 2022. The case was removed to federal  
14 court on April 25, 2022, and the parties entered into a second agreement on May 12, 2022, to extend  
15

1 Shellpoint's time to respond to the complaint until June 15, 2022. On June 15, 2022, the parties  
 2 entered into a third agreement to extend Shellpoint's time to respond to the complaint until August 1,  
 3 2022. The parties have fully briefed Collegium's pending preliminary injunction motion, ECF  
 4 Nos. 12, 15, 17, and Shellpoint has moved to expunge the lis pendens, ECF No. 16.

5 Good cause exists to grant the requested extension. Shellpoint requests additional time to  
 6 fully form its response to these allegations pursuant to its obligations under Federal Rule of Civil  
 7 Procedure 8(b). One of Shellpoint's attorneys has been on maternity leave for several months,  
 8 returning only last week, and is currently preparing for trial. Another of Shellpoint's attorneys has  
 9 been out of the office for a family trip to South America since July 20. Additionally, counsel for  
 10 Shellpoint has been inundated with preliminary injunction motions, often filed on the eve of the  
 11 foreclosure sale and on an emergency basis, which have affected counsel's ability to complete and  
 12 finalize the response to the complaint in this matter. This is the parties' fourth and final request for an  
 13 extension of this deadline, and is not intended to cause any delay or prejudice to any party.

14 DATED this 1<sup>st</sup> day of August, 2022.

15 **AKERMAN LLP**

16 */s/ Paige L. Magaster*

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 26 *Financial, LLC, d/b/a Shellpoint Mortgage*  
 27 *Servicing*

28 **CLARK NEWBERRY LAW FIRM**

29 */s/ Aimee Clark Newberry*

30 AIMEE CLARK NEWBERRY, ESQ.

31 Nevada Bar No. 11084

32 410 S. Rampart Boulevard, Suite 390

33 Las Vegas, NV 89145

34 *Attorney for Collegium Fund LLC Series #31*

35 **IT IS SO ORDERED.**

36 

37 **UNITED STATES DISTRICT COURT JUDGE**

38 Case No. 2:22-cv-00678-RFB-BNW

39 **DATED: August 2, 2022**