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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

(NORTHERN DIVISION - RENO)

TAMMY VO,

Plaintiff,

vs.

AMERICAN BROKERS CONDUIT, a New York Corporation; MORTGAGE; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., is a Delaware Corporation; FIRST CENTENNIAL TITLE, JEANETIE WILLIAMS, individually; LISA MYERS, individually, KATRINA WILLIAMS, individually; AURORA LOAN SERVICES, a Colorado Corporation; SPECIALIZED LOAN SERVICING LLC, a Colorado Corporation, QUALITY LOAN SERVICE CORPORATION, a California Corporation, and FCDB LBPL 2008-1 and RCDB PL REO LLC; and DOES 1-25 CORPORATIONS, DOES and ROES 1-25 Individuals, [Partnerships, or anyone claiming any interest to the property described in the action,

Defendants.

Case No. 3:09-cv-00654-LRH-VPC

STIPULATION AND ORDER FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT

(FIRST REQUEST)

Plaintiff Tammy Vo and Defendant Mortgage Electronic Registration Systems, Inc. ("MERS") enter into this stipulation for an extension of time for MERS to respond to the

1 Complaint, in order to promote efficiency, as Plaintiff has filed a Motion to Remand this case to
2 state court (Doc. # 5). Plaintiff and MERS stipulate and agree to the following:

3 1. MERS shall have up to and including **60 days** from entry of this order to answer
4 or otherwise respond to the complaint in the above-captioned matter or **20 days** from the
5 resolution of Plaintiff's Motion to Remand (Doc. # 5) should the Court enter an order resolving
6 Plaintiff's Motion to Remand and any oppositions filed in response before the expiration of the
7 60-day period.

8 2. Plaintiff shall file an opposition, if any, on or before thirty days after MERS files
9 its responsive pleading.

10 3. MERS shall file a reply, if any, on or before twenty-one days after plaintiff files
11 his opposition.

12 4. Participation in this Stipulation does not waive or otherwise operate to prejudice
13 MERS' rights to raise any appropriate defense, counterclaim, crossclaim or third party claim.

14 Respectfully submitted November 24, 2009,

15 /s/ Rick Lawton
16 Rick Lawton, Esq.
17 Nevada Bar No. 694
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19 5435 Reno Highway
20 Fallon, Nevada 89407
21 *Attorneys for Plaintiff*

22 /s/ Erica J. Stutman
23 Patrick G. Byrne, Esq.
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25 Erica J. Stutman, Esq.
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*Attorneys for Defendant Mortgage Electronic
Registration Systems, Inc.*

ORDER

IT IS SO ORDERED.

DATED: December 4, 2009.

LARRY R. HICKS
UNITED STATES DISTRICT JUDGE