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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 LVDG SERIES 125, established under
12 LVDG LLC, a Nevada series limited-liability
company,

13 Plaintiff,

14 vs.

15 HAROLD M. WELLES; VALERIE M.
16 WELLES; WELLS FARGO BANK, N.A.,
MTC FINANCIAL INC. d/b/a TRUSTEE
17 CORPS, DOES 1 THROUGH 20, and ROE
CORPORATIONS 1 THROUGH 20,
18 INCLUSIVE

19 Defendants.

20 WELLS FARGO BANK, N.A., a national
association,

21 Counter-Claimant,

22 vs.

23 LVDG SERIES 125, established under
24 LVDG LLC, a Nevada series limited-liability
company,

25 Counter-Defendant.

Case No. 3:13-cv-00503-LRH-WGC

**STIPULATION AND ORDER TO
EXTEND LITIGATION DEADLINES**

(First Request)

26 Pursuant to Local Rules 6-1 and 7-1, it is hereby stipulated by and between Wells Fargo
27 Bank, N.A. (“Wells Fargo”) together with LVDG Series 125, established under LVDG LLC
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1 (“LVDG”) and MTC Financial Inc. dba Trustee Corps (“MTC Financial” and jointly with Wells
2 Fargo and LVDG, the “Parties”), through their respective attorneys, as follows:

3 **STIPULATION**

4 WHEREAS, LVDG filed an Amended Complaint (ECF No. 63) on July 21, 2016
5 pursuant to an order of this Court granting LVDG appropriate leave to add parties and amend its
6 Complaint; and

7 WHEREAS, the Amended Complaint names Federal Home Loan Mortgage Corporation
8 (“Freddie Mac”) as a new defendant. In addition, it amends the claims that were previously
9 brought against Harold M. Welles and Valerie M. Welles (collectively, the “Welles”).

10 WHEREAS, summonses for service of the Amended Complaint have been issued against
11 new Defendant Freddie Mac, as well as the Welles. (ECF Nos. 74-76); and

12 WHEREAS, Freddie Mac was served with the summons and Amended Complaint on
13 October 17, 2016 (ECF No. 78) and the Welles were served with the summons and Amended
14 Complaint on October 17 and October 18, 2016, respectively (ECF No. 78-80).

15 WHEREAS, although counsel for Wells Fargo Bank may represent Freddie Mac, neither
16 Freddie Mac or the Welles have yet appeared in response to the Amended Complaint.

17 WHEREAS, the Parties understand and agree that additional discovery and motion
18 practice will be necessary once Freddie Mac and the Welles appear; and

19 WHEREAS, MTC Financial has filed a Motion to Dismiss (ECF No. 64) the Amended
20 Complaint, which Motion has been fully briefed; and

21 WHEREAS, Wells Fargo and LVDG have agreed that Wells Fargo’s response to the
22 Amended Complaint will be due on the same date as the response due by Freddie Mac; and

23 WHEREAS, the current litigation deadlines are to be reset upon the appearance of Freddie
24 Mac and the Welles.

25 NOW THEREFORE the Parties agree and request this Court enter an order allowing for
26 an extension of the current litigation deadlines to be reset once Freddie Mac and the Welles have
27 appeared in this case. The Parties further agree to appear for a status conference at the request of
28 the court. The Parties agree that this request for extending discovery and dispositive motions

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deadlines is made in good faith and not for any improper purpose, but rather to afford the Parties and the newly appearing parties the opportunity to complete discovery in this litigation and with respect to the Amended Complaint.

Because Freddie Mac and the Welles have not yet appeared, the Parties agree that upon the appearance of said defendants, they will meet and confer to propose new litigation deadlines consistent with the needs of all parties and the claims and defenses of this case. The Parties further agree that they will consider those elements contained in the Court’s Minute Order (ECF No. 51) and will submit a supplemental Case Management Report consistent with the Court’s Minute Order.

This is the Parties’ first request to extend litigation deadlines.

DATED this 20th day of October, 2016.
SNELL & WILMER L.L.P.

DATED this 20th day of October, 2016.
ROGER P. CROTEAU & ASSOCIATES

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(Remaining Signatures on Following Page)

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(Remaining Signatures and Order re Stipulation to Extend Litigation Deadlines)

DATED this 20th day of October, 2016.

BROOKS HUBLEY, LLP

/s/ Michael R. Brooks
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ORDER

IT IS SO ORDERED.

William G. Cobb
UNITED STATES MAGISTRATE JUDGE

DATED: October 21, 2016.