

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200  
LAS VEGAS, NEVADA 89134  
TEL.: (702) 634-5000 – FAX: (702) 380-8572

1 ARIEL E. STERN, ESQ.  
Nevada Bar No. 8276  
2 VATANA LAY, ESQ.  
Nevada Bar No. 12993  
3 AKERMAN LLP  
1635 Village Center Circle, Suite 200  
4 Las Vegas, NV 89134  
Telephone: (702) 634-5000  
5 Facsimile: (702) 380-8572  
Email: ariel.stern@akerman.com  
6 Email: vatana.lay@akerman.com

7 Attorneys for Plaintiff Bank of America, N.A.

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

11 BANK OF AMERICA, N.A.,  
12 Plaintiff,

Case No.: 3:16-cv-00127-HDM-WGC

13 v.

**STIPULATION AND ORDER OF  
DISMISSAL AND QUIET TITLE**

14 SIERRA CEDARS CONDOMINIUM  
15 HOMEOWNERS ASSOCIATION; LVDG  
SERIES 200, LLC; THUNDER PROPERTIES,  
16 INC.; HAMPTON & HAMPTON  
COLLECTIONS, LLC,

17 Defendants.

18  
19 Plaintiff Bank of America, N.A. ("BANA") and defendants Sierra Cedars Condominium  
20 Homeowners Association ("Sierra Cedars"), Thunder Properties, Inc. ("Thunder"), LVDG Series 200,  
21 LLC ("LVDG"), and Hampton & Hampton Collections, LLC ("Hampton") being the only parties to  
22 have appeared in this action, through their counsel of record, stipulate as follows:

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1           1.       This matter relates to real property located at 2201 Kietzke Lane #B, Reno, Nevada  
2 89123, APN 015-314-17 (the "Property"). The property is more specifically described as:

3           Parcel 1:

4           Unit 16 A, in Block 1, of the AMENDED PLAT OF SIERRA CEDARS  
5 CONDOMINIUMS, according to Tract Map No. 1893, filed in the office of the Washoe  
6 County Recorder, State of Nevada, on October 26, 1979.

7           Parcel 2:

8           The exclusive right to use the limited common area consisting of the Carport and a Balcony  
9 or Patio appurtenant to Parcel 1 as shown on the AMENDED PLAT OF SIERRA CEDARS  
10 CONDOMINIUMS, according to Tract Map No. 1893, filed in the office of the Washoe  
11 County Recorder, State of Nevada, on October 26, 1979.

12           Parcel 3:

13           An undivided 1/176th interest in all the common area of the AMENDED PLAT OF  
14 SIERRA CEDARS CONDOMINIUMS, according to the map thereof, filed in the  
15 office of the County Recorder of Washoe County, State of Nevada, on October 26,  
16 1979, as Tract Map No. 1893.

17           APN: 015-314-17

18           2.       BANA is the beneficiary of a Deed of Trust that encumbers the Property and was  
19 recorded on August 1, 2006, as Document Number 3421051 in the Official Records of Washoe  
20 County, Nevada (the "Deed of Trust").

21           3.       On February 27, 2014, LVDG recorded a Trustee's Deed Upon Sale as Document  
22 Number 4329796 of the Official Records of Washoe County, Nevada (the "HOA Foreclosure Deed"),  
23 reflecting that LVDG acquired the Property at a foreclosure sale of the Property held on January 23,  
24 2014 (the "HOA Sale").

25           4.       On July 22, 2015, LVDG transferred its interest in the Property to Thunder by grant deed  
26 (the "Grant Deed") recorded as Document Number 4494587 in the Official Records of Washoe  
27 County, Nevada. Thunder has not transferred its interest and remains the title holder of record.

28           5.       On March 4, 2016, BANA initiated this quiet title action in the United States District  
Court, District of Nevada, Case No. 3:16-cv-00127 (the "Quiet Title Action").

1           6.       The parties have entered a settlement agreement in which they have settled all claims  
2 between them in this case.

3           7.       Among other things, Thunder agrees that it will transfer all interest it acquired as a result  
4 of the HOA Sale, HOA Foreclosure Deed, and Grant Deed by quitclaim deed to BANA, which it will  
5 execute and deliver to BANA after the April 30, 2019 termination of the current lease encumbering  
6 the Property and before May 5, 2019.

7           8.       Among other things, the parties agree that title to the Property will be quieted in BANA’s  
8 favor upon the delivery to BANA's counsel of the quitclaim deed required by the preceding paragraph.  
9 The other parties disclaim all right, title, or interest in the Property as a result of the HOA Sale and the  
10 HOA Foreclosure Deed.

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1 9. LVDG and Thunder disclaims any right to the excess proceeds that arose from  
2 Hampton’s foreclosure of the lien held by HOA that encumbered the Property.

3 Dated: December 4th, 2018.

Dated: December 4th, 2018.

4 **AKERMAN LLP**

**NEVADA ASSOCIATION SERVICES, INC.**

5 /s/ Vatana Lay

/s/ Brandon E. Wood

6 ARIEL E. STERN, ESQ.

BRANDON E. WOOD, ESQ.

7 Nevada Bar No. 8276

Nevada Bar No. 12900

8 VATANA LAY, ESQ.

6224 West Desert Inn Road

9 Nevada Bar No. 12993

Las Vegas, NV 89146

10 AKERMAN LLP

Attorneys for Hampton & Hampton  
Collections, LLC

11 1635 Village Center Circle, Suite 200

12 Las Vegas, NV 89134

13 Attorneys for Bank of America, N.A.

14 Dated: December 4th, 2018.

Dated: December 4th, 2018.

15 **ROGER CROTEAU & ASSOCIATES, LTD**

**LIPSON NEILSON PC**

16 /s/ Timothy Rhoda

/s/ David A. Clark

17 TIMOTHY RHODA, ESQ.

DAVID A. CLARK, ESQ.

18 Nevada Bar No. 7878

Nevada Bar No. 4433

19 9120 West Post Road, Suite 100

9900 Covington Cross Drive, Suite 120

20 Las Vegas, NV 89148

Las Vegas, NV 89144

21 Telephone: (702) 634-5000

22 Facsimile: (702) 380-8572

Attorneys for Sierra Cedars

23 Attorneys for Thunder Properties, Inc.

Condominium Homeowners Association

24 and LVDG Series 200, LLC

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**ORDER**

Plaintiff Bank of America, N.A. and defendants Sierra Cedars Condominium Homeowners Association, Thunder Properties, Inc., LVDG Series 200, LLC, and Hampton & Hampton Collections, LLC, the Parties agreement, and good cause appearing therefore,

**IT IS ORDERED** that upon the delivery to Bank of America's counsel of the quitclaim deed as required by the parties' stipulation set forth herein, title to the real property located 2201 Kietzke Lane #B, Reno, Nevada 89123, APN 015-314-17 will be quieted in favor of Bank of America, N.A.

**IT IS FURTHER ORDERED** that all claims in this case are dismissed with prejudice, each side to bear its own attorney fees and costs. This is the final judgment of this Court.

DATED: December 7, 2018.



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DISTRICT COURT JUDGE