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10 Attorneys for Plaintiff, Deutsche Bank National Trust Company, formerly known as Bankers  
 11 Trust Company of California, N.A., as Trustee for American Home Mortgage Assets Trust 2006-  
 12 1

13 **UNITED STATES DISTRICT COURT**  
 14 **FOR THE DISTRICT OF NEVADA**

15 DEUTSCHE BANK NATIONAL TRUST  
 16 COMPANY, FORMERLY KNOWN AS  
 17 BANKERS TRUST COMPANY OF  
 18 CALIFORNIA, N.A., AS TRUSTEE FOR  
 19 AMERICAN HOME MORTGAGE ASSETS  
 20 TRUST 2006-1,

21 Plaintiff,

22 vs.

23 THUNDER PROPERTIES INC.; KERN &  
 24 ASSOCIATES, LTD.; DOE INDIVIDUALS I  
 25 through X, inclusive; and ROE  
 26 CORPORATIONS XI through XX, inclusive,

27 Defendants.

Case No.: 3:16-cv-00381-MMD-WGC

**STIPULATION AND ORDER TO STAY  
 CASE PENDING SETTLEMENT**

19 Plaintiff, Deutsche Bank National Trust Company, formerly known as Bankers Trust  
 20 Company of California, N.A., as Trustee for American Home Mortgage Assets Trust 2006-1  
 21 (“Deutsche Bank”) and Defendant, Thunder Properties, Inc. (“Defendant” or “Thunder  
 22 Properties”), by and through their respective counsel of record, stipulate and agree to stay all  
 23 proceedings in this case pending settlement of this matter.

- 24 1. Deutsche Bank filed its Complaint on June 27, 2016, naming Defendant [ECF No.  
 25 1].
- 26 2. Deutsche Bank filed its Amended Complaint on September 27, 2017, naming  
 27 Thunder Properties, Edgewater Homeowners Association (“Edgewater” or “HOA”) and Kern &  
 Associates, Ltd. (“Kern”) [ECF No. 16].

1           3. Defendant, Kern was dismissed pursuant to an Order approving Stipulation  
2 entered on November 18, 2017 [ECF No. 32].

3           4. Defendant, HOA was dismissed pursuant to a Minute Order Granting Motion to  
4 Dismiss entered on April 4, 2018 [ECF No. 52].

5           5. Discovery is proceeding pursuant to the schedule set forth under a Minute Order  
6 entered on April 4, 2018 [ECF No. 53].

7           6. The undersigned attorneys, together with counsel for the HOA, have agreed upon  
8 a global resolution of this matter. They anticipate that it will take between approximately 30  
9 and 60 days to prepare, review and execute appropriate settlement documents.

10          7. The parties, thus, stipulate to stay this case including discovery and dispositive  
11 motion deadlines pending the execution of settlement documents and the dismissal of this  
12 action.

13          8. The Parties agree that a stay of this case will not result in damages, prejudice, or  
14 hardship to any party and is likely to save the Court and Parties significant resources, including  
15 fees, costs, and time which would surely be expended if litigation were required to continue.

16          9. Therefore, the Parties jointly request that this action be stayed subject to the terms  
17 of this Stipulation.

18                   **IT IS SO STIPULATED.**

19                   WRIGHT, FINLAY & ZAK, LLP

20                   ROGER P. CROTEAU & ASSOCIATES,  
21 LTD.

22 By: /s/ Yanxiong Li, Esq.  
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27 Attorneys for Plaintiff

By: /s/ Timothy E. Rhoda, Esq.  
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Attorneys for Thunder Properties, Inc.

**ORDER**

**IT IS SO ORDERED.**



UNITED STATES DISTRICT COURT JUDGE

Dated: September 10, 2018