

1 GAYLE A. KERN, ESQ.
Nevada Bar No. 1620
2 KAREN M. AYARBE, ESQ.
Nevada Bar No. 3358
3 KERN & ASSOCIATES, LTD.
4 5421 Kietzke Lane, Ste. 200
Reno, Nevada 89511
5 Tel: (775) 324-5930
6 Fax: (775) 324-6173
Email: karenayarbe@kernltd.com

7 *Attorneys for Defendant, Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.*

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

10 CHAMPERY RENTAL REO, LLC,

Case No.: 3:17-cv-00162-MMD-WGC

11 Plaintiff,

12 v.

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR GAYLE A.
KERN, LTD. DBA KERN &
ASSOCIATES, LTD. TO ANSWER OR
OTHERWISE RESPOND TO THIRD
AMENDED COMPLAINT**

13
14 RAE NOLA EDWARDS an individual;
15 FEDERAL NATIONAL MORTGAGE
ASSOCIATION; QUALITY LOAN SERVICE
16 CORPORATION; KERN & ASSOCIATES,
LTD.; SPRINGLAND VILLAGE
17 HOMEOWNERS ASSOCIATION; All other
18 persons unknown claiming any right, title,
estate, lien or interest in the real property
19 described in the Complaint adverse to
20 Plaintiff's ownership, or any cloud upon
Plaintiff's title thereto; DOES I through V; and
21 ROE Corporations I through V,

[*Second Request*]

22 Defendants.

23 _____ /
24 **AND RELATED CLAIMS** _____ /

25 ***IT IS HEREBY STIPULATED*** between Plaintiff, CHAMPERY RENTAL REO, LLC
26 ("Plaintiff"), by and through its counsel, Hutchison & Steffen, LLC, and Defendant, Gayle A.
27 Kern, Ltd. dba Kern & Associates, Ltd. ("Kern"), by and through its counsel Kern & Associates,

1 Ltd., to extend the deadline for Kern to answer or otherwise respond to Plaintiff's Third Amended
2 Complaint up to and including April 9, 2018. Pursuant to a prior stipulation entered into and
3 approved by the Court (DE 67), Kern's current deadline to answer or otherwise respond to the
4 Third Amended Complaint is March 9, 2018.
5

6 Plaintiff and Kern (collectively the "Parties") have been, and continue to be, engaged in
7 substantive discussions regarding the claims and defenses in this matter, interpleader of the surplus
8 funds, and potential resolution. It is the Parties' intent to conserve the time and resources of the
9 Parties and the Court while such discussions move forward. Therefore, good cause exists for the
10 extension up to and including April 9, 2018. This is the second request for an extension of time
11 as to the Third Amended Complaint and is not intended to cause delay or prejudice to any party.
12

13 DATED this 8th day of March, 2018.

DATED this 8th day of March, 2018.

14 ***KERN & ASSOCIATES, LTD.***

HUTCHINSON & STEFFEN, LLC

15 */s/ Karen M. Ayarbe, Esq.*

/s/ Matthew K. Schriever, Esq.

16 KAREN M. AYARBE, ESQ.

MATTHEW K. SCHRIEVER, ESQ.

17 Nevada Bar No. 3358

Nevada Bar No. 10745

18 5421 Kietzke Lane, Ste. 200

10080 West Alta Drive, Ste. 200

19 Reno, NV 89511

Las Vegas, NV 89145

20 Tel: (775) 324-5930

Tel: (702) 385-2500

21 Email: karenayarbe@kernltd.com

Email: mschriever@hutchlegal.com

22 *Attorneys for Defendant, Gayle A. Kern,*

Attorneys for Plaintiff

23 *Ltd. dba Kern & Associates, Ltd.*

Champery Rental REO, LLC

24 **ORDER**

25 ***IT IS SO ORDERED.***

26 DATED this 12th day of March 2018.

27 *William G. Cobb*

28

UNITED STATES MAGISTRATE JUDGE