

1 HOLLY E. ESTES, ESQ.  
 Nevada Bar No. 11797  
 2 ESTES LAW, P.C.  
 605 Forest Street  
 3 Reno, Nevada 89509  
 Telephone (775) 321-1333  
 4 Facsimile (775) 321-1314  
*Email: hestes@esteslawpc.com*

5 Attorney for Paul and Evy Paye, LLC

7 UNITED STATES DISTRICT COURT  
 8 DISTRICT OF NEVADA

10 —ooOoo—

11 In Re:	Case No. BK-N-16-51282-GWZ
	Chapter 11
12 NEW CAL-NEVA LODGE, LLC,	
13 Debtor.	<b>Lead Case:</b> Appeal Reference No. 17-49
14 _____ /	District Court No. 3:17-cv-00636-RCJ
15 PAUL AND EVY PAYE, LLC, a	<b>Consolidated with:</b>
16 California limited liability company,	Appeal Reference No. 17-50
17 Appellant.	District Court No. 3:17-cv-00640-RCJ

18 v.

19 LAWRENCE INVESTMENTS, LLC;  
 20 THE OFFICIAL COMMITTEE OF  
 UNSECURED CREDITORS; NEW CAL  
 21 NEVA LODGE, LLC; CR LAKE  
 TAHOE, LLC; 9898 LAKE, LLC,

**STIPULATION TO EXTEND  
 BRIEFING SCHEDULE**  
 (First Request)

22 Appellees.

23 \_\_\_\_\_ /

24 Appellants, Paul and Evy Paye, LLC, a California limited liability company (“Paye”)  
 25 by and through its counsel, Holly E. Estes, Esq., of Estes Law, P.C., Appellants, Hall CA-NV  
 26 LLC, a Texas limited liability company (“Hall”), by and through its counsel, Frank J. Wright,  
 27 Esq., Appellee, Lawrence Investments, LLC (“Lawrence”), by and through its counsel Eric  
 28 Goldberg, Esq., of DLA Piper LLP, Appellee, the Official Committee of Unsecured  
 Creditors (the “Committee”), by and through its counsel Shirley S. Cho, Esq., of Pachulski

1 Stang Ziehl & Jones LLP, and interested party, Penta Building Group, LLC (“Penta”), by and  
2 through its counsel Dawn M. Cica, Esq., of Mushkin Cica Coppedge (hereinafter  
3 cumulatively referred to as the “Parties”), hereby stipulate and agree to extend the Parties  
4 briefing schedule pursuant to LR IA 6-1 and LR 26-4 as follows:

5 **RECITALS**

6 1. The current deadline for Appellants, Paye and Hall, to file an opening brief is  
7 Friday, December 1, 2017 by 5:00 p.m. *See* [DE 20].

8 2. The current deadline for Appellees to file answering briefs is Monday,  
9 December 18, 2017 by 5:00 p.m. *See* [DE 20].

10 3. The current deadline for Appellants, Paye and Hall, to file a final reply brief  
11 is Thursday, December 28, 2017 at 5:00 p.m. *See* [DE 20].

12 4. Oral argument hearing is currently scheduled for Wednesday, January 17, 2018  
13 at 10:00 a.m. *See* [DE 20].

14 5. The Parties have been engaged in ongoing settlement discussions since the date  
15 of the Court’s last hearing on these matters.

16 6. In light of the ongoing settlement discussions, the Parties believe that it is in  
17 the best interest of **all** that the Parties focus their efforts on working toward a settlement,  
18 rather than briefing pleadings in the consolidated appeals that may become moot. This is the  
19 Parties’ first request for an extension of the briefing deadline.

20 7. Because of the expedited briefing schedule set in this appeal and the continued  
21 on-going settlement discussions, the Parties’ stipulated request to extend the briefing  
22 schedule to focus on settlement is timely.

23 **STIPULATION**

24 Good cause existing, the Parties HEREBY STIPULATE AND AGREE:

25 8. That the briefing deadlines shall be extended by 14 days in all instances,  
26 which would allow the hearing on oral argument to remain on Wednesday, January 17,  
27 2018 at 10:00 a.m. if the appeals move forward. Accordingly, the Parties agree that the  
28 new briefing schedule shall be:

- 1 a. Deadline for Appellants, Paye and Hall, to file an opening brief is  
2 Friday, December 15, 2017 by 5:00 p.m.
- 3 b. Deadline for Appellees to file answering briefs is Monday, January  
4 1, 2018 by 5:00 p.m.
- 5 c. Deadline for Appellants, Paye and Hall, to file a final reply brief is  
6 Thursday, January 11, 2018 at 5:00 p.m.
- 7 d. Oral argument set for Wednesday, January 17, 2018 at 10:00 a.m., or  
8 such other date as is convenient to the Court's calendar.

9 IT IS SO STIPULATED.

10 **DATED** this 22nd day of November, 2017.

11 ESTES LAW

12 By: */s/ Holly E. Estes*  
13 HOLLY E. ESTES, ESQ.  
Paul and Evy Paye, LLC

14 **DATED** this 27th day of November, 2017.

15  
16 By: */s/ Frank J. Wright*  
17 FRANK J. WRIGHT, ESQ.  
Hall CA-NV, LLC

18 **DATED** this 27th day of November, 2017.

19 DLA PIPER LLP

20 By: */s/ Eric Goldberg*  
21 ERIC GOLDBERG, ESQ.  
Lawrence Investments, LLC

22 **DATED** this 26th day of November, 2017.

23 PACHULSKI STANG ZIEHL & JONES LLP

24  
25 By: */s/ Shirley S. Cho, Esq.*  
SHIRLEY S. CHO, ESQ.  
26 Official Committee of Unsecured Creditors

27 ///

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

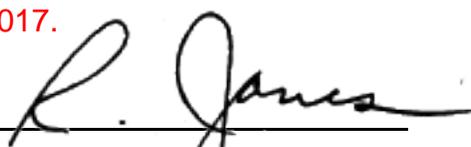
**DATED** this 26th day of November, 2017.

MUSHKIN CICA COPPEDGE

By: /s/ Dawn M. Cica  
DAWN M. CICA, ESQ.  
Penta Building Group, LLC

**IT IS SO ORDERED.**

**DATED** this \_\_\_ 28th day of November, 2017.

By:   
UNITED STATES DISTRICT JUDGE or  
UNITED STATES MAGISTRATE JUDGE