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 600 Peachtree St. NE #3000
 6 Atlanta, GA 30308 (*Corporate Office*)
 7 *Attorneys for Defendants*
Nationstar Mortgage LLC, dba Mr. Cooper

8
 9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11
 12 SFR INVESTMENTS POOL 1, LLC,

13 Plaintiff,

14 v.

15 NATIONSTAR MORTGAGE LLC, DBA
 MR. COOPER; DOES 1 through X; and
 16 ROE CORPORATIONS I through X,
 inclusive,,
 17

18 Defendant.

Case No. 3:22-cv-00128-MMD-CLB

**STIPULATION AND ORDER TO EXTEND
 DEADLINES TO FILE REPLY IN
 SUPPORT OF NATIONSTAR
 MORTGAGE LLC d/b/a MR. COOPER'S
 MOTION FOR DISMISS**

19 On February 01, 2022, SFR Investments Pool 1, LLC (“SFR”) filed a Complaint in the
 20 Second Judicial District Court, Case No. CV22-00164, against Defendant Nationstar Mortgage
 21 LLC d/b/a Mr. Cooper (“Nationstar”).

22 On March 10, 2022, Nationstar filed a Notice of Removal to Federal Court Based on
 23 Diversity Jurisdiction in the United States District Court, District of Nevada, Case no. 3:22-cv-
 24 00128. Thereafter, Nationstar filed its Motion to Dismiss Plaintiff’s Complaint on May 2, 2022.

25 Accordingly, the parties stipulated as follows:

26 1. Defendant Nationstar shall file its Reply in Support of its Motion to Dismiss on or
 27 before June 1, 2022; and
 28

1 2. Defendant, and its assigns or successors, agrees to refrain from setting the
2 foreclosure sale of the real property located at 6461 Meadow Hill Drive, Reno, Nevada 89509,
3 until such time as this Court rules on the motion for preliminary injunction.

4 3. Both parties represent this stipulation is not made with any intent to delay or
5 prejudice either party.

6
7 DATED May 24, 2022.

<p>9 By: <u> /s/ Vanessa M. Turley </u> 10 Vanessa M. Turley, Esq. 11 Nevada Bar No. 14635 12 8985 S. Eastern Ave., Ste. 200 13 Las Vegas, NV 89123 (<i>Nevada Office</i>) 14 600 Peachtree St. NE #3000 15 Atlanta, GA 30308 (<i>Corporate Office</i>) 16 Tele: (470) 832-5572 17 Fax: (404) 962-6800 18 vanessa.turley@troutman.com 19 Attorneys for Defendants Nationstar 20 Mortgage LLC, dba Mr. Cooper</p>	<p>21 By: <u> /s/ Karen L. Hanks (w/consent) </u> 22 Karen L. Hanks, Esq. 23 Nevada Bar Number 9578 24 HANKS LAW GROUP 25 7625 Dean Martin Drive, Suite 110 26 Las Vegas, Nevada 89139 27 Telephone: (702) 758-8434 28 Email: karen@hankslg.com 29 Attorney SFR Investments Pool 1, LLC</p>
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30 IT IS HEREBY ORDERED that Nationstar shall file its Reply in Support of its Motion to
31 Dismiss on or before June 1, 2022.

32 Dated: 5/24/2022



33 UNITED STATES DISTRICT COURT

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Troutman Pepper Hamilton Sanders LLC, and that on the 24th day of May, 2022, I caused to be served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINES TO FILE REPLY IN SUPPORT OF NATIONSTAR’S MOTION TO DISMISS**, in the following manner:

(**ELECTRONIC SERVICE**) document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List as follows:

Karen L. Hanks, Esq.
Chantel M. Schimming, Esq.
HANKS LAW GROUP
7625 Dean Martin Drive, Suite 110
Las Vegas, Nevada 89139
Tel: 702.758.8434
Email: karen@hankslg.com
Email: chantel@hankslg.com
Attorneys for SFR Investments Pool 1, LLC

 /s/ Janet Kusch
An employee of Troutman Pepper Hamilton Sanders LLC

Archived: Tuesday, May 24, 2022 8:53:40 AM

From: [Chantel Schimming](#)

Mail received time: Mon, 23 May 2022 18:50:17

Sent: Mon, 23 May 2022 22:50:10

To: [Turley, Vanessa M.](#), [Turley, Vanessa M.](#)

Cc: [Candi Fay](#), [Karen Hanks](#), [STAFF HANKSLG](#), [Streible, Elizabeth M.](#), [Kusch, Janet Owen](#), [Balsler, Justin D.](#), [Wight, Brody R.](#), [Streible, Elizabeth M.](#), [Balsler, Justin D.](#), [Wight, Brody R.](#)

Subject: RE: Requests for Extensions - Drafi, Paguia, Dipietro,

Importance: Normal

Sensitivity: None

EXTERNAL SENDER

Both are approved for my e-signature.

Thanks,
Chantel



Chantel M. Schimming, Esq.
Associate Attorney

HANKS LAW GROUP

7625 Dean Martin Drive, Suite 110

Las Vegas, Nevada 89139

Telephone: (702) 758-8434

Facsimile: (725) 239-3415

mail to: chantel@hankslg.com <http://www.hankslg.com>

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From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Sent: Monday, May 23, 2022 3:44 PM

To: Chantel Schimming <chantel@hankslg.com>

Cc: Candi Fay <candi@hankslg.com>; Karen Hanks <karen@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Kusch, Janet Owen <Janet.Kusch@troutman.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Wight, Brody R. <Brody.Wight@troutman.com>

Subject: RE: Requests for Extensions - Drafi, Paguia, Dipietro,

Hi Chantel,

Here are the SAO's for Schwartz (Meadow Hill) and Dipietro (Brilliant Summit). Please let me know if you have any changes or if I may affix your e-signature.

Thank you again,

Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

From: Chantel Schimming <chantel@hankslg.com>

Sent: Monday, May 23, 2022 1:50 PM

To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Cc: Candi Fay <candi@hankslg.com>; Karen Hanks <karen@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Kusch, Janet Owen <Janet.Kusch@troutman.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Wight, Brody R. <Brody.Wight@troutman.com>

Subject: RE: Requests for Extensions - Drafi, Paguia, Dipietro,

EXTERNAL SENDER

Not a problem. I know it is a struggle to jump into something mid stream.

Thanks,
Chantel



Chantel M. Schimming, Esq.

Associate Attorney

HANKS LAW GROUP

7625 Dean Martin Drive, Suite 110

Las Vegas, Nevada 89139

Telephone: (702) 758-8434

Facsimile: (725) 239-3415

mail to: chantel@hankslg.com <http://www.hankslg.com>

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Unless expressly stated otherwise, any U.S. federal tax advice contained in this transmittal, is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this e-mail or attachment.

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Sent: Monday, May 23, 2022 10:48 AM
To: Chantel Schimming <chantel@hankslg.com>
Cc: Candi Fay <candi@hankslg.com>; Karen Hanks <karen@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Kusch, Janet Owen <Janet.Kusch@troutman.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>; Wight, Brody R. <Brody.Wight@troutman.com>
Subject: RE: Requests for Extensions - Drafi, Pagua, Dipietro,

Hi Chantel,

Thank you so much for being gracious with these extensions while I am still getting up to speed. With that being said, I would like to request two additional extensions for the Schwartz (6461 Meadow Hill Drive) Reply (Due today - 5/23) and the Dipietro (337 Brilliant Summit Circle) Response to Motion for Preliminary Injunction & Responsive Pleading (Due 5/25).

If we could have an additional week to June 1st for both, we would greatly appreciate the courtesy. Please let me know if you are agreeable and I will circulate a Stipulation and Order.

Thank you,

Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

From: Chantel Schimming <chantel@hankslg.com>
Sent: Sunday, May 22, 2022 5:36 PM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Cc: Candi Fay <candi@hankslg.com>; Karen Hanks <karen@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Kusch, Janet Owen <Janet.Kusch@troutman.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>
Subject: Re: Requests for Extensions - Drafi, Pagua, Dipietro,

EXTERNAL SENDER

Approved for my e-signature.

Thanks,
Chantel

Sent from my T-Mobile 5G Device
Get [Outlook for Android](#)

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Sent: Sunday, May 22, 2022 3:23:01 PM

To: Chantel Schimming <chantel@hankslg.com>

Cc: Candi Fay <candi@hankslg.com>; Karen Hanks <karen@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Kusch, Janet Owen <Janet.Kusch@troutman.com>; Balser, Justin D. <Justin.Balser@troutman.com>

Subject: RE: Requests for Extensions - Drafi, Paguia, Dipietro,

Hi Chantel,

Here is the Stipulation and Order re additional time to file responsive pleading and postponement of sale of the property. Please let me know if you have any changes or if I can submit to Court.

Thanks,

Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Sent: Friday, May 20, 2022 12:42 PM

To: Chantel Schimming <chantel@hankslg.com>

Cc: Candi Fay <candi@hankslg.com>; Karen Hanks <karen@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Kusch, Janet Owen <Janet.Kusch@troutman.com>; Balser, Justin D. <Justin.Balser@troutman.com>

Subject: Re: Requests for Extensions - Drafi, Paguia, Dipietro,

Yes. I'll send the stip today. We will put in the stip that the sale will be postponed.

Thank you!

Sent from my iPhone

Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

On May 20, 2022, at 8:50 AM, Chantel Schimming <chantel@hankslg.com> wrote:



EXTERNAL SENDER

We can agree to the extension. Send over the SAO.

Paralegal/Administrator



Hanks Law Group

7625 Dean Martin Drive, Suite 110

Las Vegas, Nevada 89139

Telephone: (702) 758-8434

mail to: candi@hankslg.com <http://www.hankslg.com>

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Sent: Thursday, April 28, 2022 3:04 PM

To: Karen Hanks <karen@hankslg.com>; Chantel Schimming <chantel@hankslg.com>

Cc: Candi Fay <candi@hankslg.com>; STAFF HANKSLG <staff@hankslg.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Kusch, Janet Owen <Janet.Kusch@troutman.com>; Balsler, Justin D. <Justin.Balsler@troutman.com>

Subject: Requests for Extensions - Drafi, Paguaia, Dipietro,

Hi Karen and Chantel,

I am writing to request a three-week extension in the following matters:

Borrower:	Address:	Items for Extension:	Due Date:	Proposed Due Date:
Paguaia	6171 Fox Creek	Response to Motion for Preliminary Injunction & Responsive Pleading	May 4	May 25
Drafi	9147 Cantina Creek Ct	Responsive Pleading	Today, April 28	May 20
Dipietro, Lucie	337 Brilliant Summit Circle	Response to Motion for Preliminary Injunction & Responsive Pleading	May 4	May 25

In Schwartz we will file our responsive pleading on Monday May 2 per our agreement yesterday. If you would like me to circulate Stipulations for these three matters, just let me know and I'd be happy to. Thank you in advance for your courtesy.

