

1                                   **IN THE SUPREME COURT**  
2                                   **OF THE STATE OF NEVADA**

3                   **AMY FACKLAM,**

4                                   Appellant,

5                   vs.

6                   **HSBC BANK USA, National**  
7                   **Association, as TRUSTEE for**  
8                   **DEUTCHE ALT-A**  
9                   **SECURITIES MORTGAGE**  
10                   **LOAN TRUST, MORTGAGE**  
11                   **PASS-THROUGH**  
                      **CERTIFICATES SERIES 2007-**  
                      **AR2,**

                                  Respondent.

Case Number: 70786      Electronically Filed  
D.C. Case No: A-16-733762-C      Jul 29 2016 01:14 p.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

**APPELLANT’S NOTICE**  
                      **OF NON-OPPOSITION**  
                      **OF APPELLANT’S**  
                      **MOTION FOR**  
                      **INJUNCTIVE RELIEF**

                      \*\*\* RELIEF NEEDED BY  
                      AUGUST 16, 2016 \*\*\*

12                   COMES NOW Appellant, Amy Facklam, through her counsel, Jacob  
13                   Hafter, Esq., of **HafterLaw**, and files this NOTICE OF NON-OPPOSITION  
14                   to Appellant’s Motion for Injunctive Relief filed on July 14, 2016.

15                   A trustee’s sale of Appellant’s home, the subject of the instant appeal,  
16                   has been set for August 17, 2016. Appellant’s rights in the instant case would  
17                   be diminished, if not made moot, by allowing this sale to proceed.  
18                   Accordingly, Appellant seeks assistance from this Court to prevent the sale.

19                   ///

20                   ///

1 Nevada Rule of Appellant Procedure 27(a)(1) states that “[a]n  
2 application for an order or other relief is made by motion unless these Rules  
3 prescribe another form.” The Rule further states that “[a] motion must be in  
4 writing and be accompanied by proof of service.” Id. To ensure that  
5 Appellant’s rights in this instant case are not destroyed by the upcoming  
6 Trustee’s sale, on July 14, 2016, a day after receiving notice of the sale,  
7 Appellant filed a Motion for Injunctive Relief.

8 “The response must be filed within 7 days after service of the motion  
9 unless the court shortens or extends the time.” NRAP 27(a)(3)(A).  
10 Beginning with the day after the filing, NRAP 26(a)(1), and not counting  
11 weekends and other non-judicial days, NRAP 26(a)(2), Respondents should  
12 have filed their response to the Motion by Monday, July 25, 2016. As of  
13 today, Friday, June 29, 2016, no response has been filed.

14 Accordingly, Appellant files this Notice of Non-Opposition and asks  
15 this Court to **GRANT** the Motion for Injunctive Relief.

16 DATED THIS 14<sup>TH</sup> day of April, 2016.

17 **HAFTERLAW**

18 By:   
19 \_\_\_\_\_

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*Counsel for Appellant*

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I certify that I am an employee of HAFterLaw, and that on this 29<sup>th</sup> day

y, 2016, I served a copy of the **NOTICE OF NON-OPPOSITION** as

☒ **Electronic Service** —By filing a true copy thereof with the

☐ U.S. Mail—By depositing a true copy thereof in the U.S. mail, first

☐ Facsimile—By facsimile transmission pursuant to EDCR 7.26 to the

☐ **Hand Delivery**—By hand-delivery to the addresses listed below.

☒ **Electronic Delivery**—By e-mailing a true copy to the addresses

Jeffrey S. Allison, Esq.

Lindsey E. Pena, Esq.

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*Attorneys for HSBC Bank USA National Association.*

/s/ Kelli N. Wightman

An Employee of the HAFTERLAW