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Elizabeth A. Brown
Clerk of Supreme Court

10 IN THE SUPREME COURT OF THE STATE OF NEVADA

11 ***

12 LAS VEGAS DEVELOPMENT GROUP, LLC,)
a Nevada limited liability company,)
13)
Appellant,)
14)
vs.)
15)
JAMES R. BLAHA, an individual; BANK OF)
16 AMERICA, NA, a National Banking)
Association, as successor by merger to BAC)
17 HOME LOANS SERVICING, LP;)
RECONTRUST COMPANY NA, a Texas)
18 corporation; EZ PROPERTIES, LLC, a Nevada)
limited liability company; K&L BAXTER)
19 FAMILY LIMITED PARTNERSHIP, a Nevada)
limited partnership; FCH FUNDING, INC, an)
20 unknown corporate entity,)
Respondents.)
21)

Supreme Court No. 79055

District Court Case No. A-15-715532-C

22 **STIPULATION TO EXTEND TIME**

23 **TO FILE OPENING BRIEF AND APPENDIX**

24 **(First Request)**

25 COMES NOW Appellant, LAS VEGAS DEVELOPMENT GROUP, LLC, and
26 Respondents, JAMES R. BLAHA; BANK OF AMERICA, NA; RECONTRUST COMPANY
27 NA; EZ PROPERTIES, LLC; K&L BAXTER FAMILY LIMITED PARTNERSHIP; and FCH
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1 FUNDING, INC, by and through their respective undersigned counsel, and hereby stipulate and
2 agree as follows:

- 3 1. The parties hereto are presently discussing a stipulated remand of this matter
4 pursuant to *Huneycutt v. Huneycutt*, 94 Nev. 79, 575 P.2d 585 (1978),
5 disapproved on other grounds by *Foster v. Dingwall*, 126 Nev. ____, 228 P.3d
6 453 (2010), as a result of this Court recent reconsideration of *Bank of Am., N.A. v.*
7 *Thomas Jessup, LLC Series VII*, 135 Nev. 42, 435 P.3d 1217 (2019) ("*Jessup I*").
8 The Order appealed from herein is premised in large part upon *Jessup I*. Most of
9 the parties have agreed to this disposition but one party is still considering the
10 matter.
- 11 2. If the matter is remanded by agreement, there will be no need for the filing of an
12 Opening Brief and Appendix herein.
- 13 3. The Opening Brief is currently due on or about June 18, 2020.
- 14 4. The parties hereby stipulate and agree that Appellant shall have an extension of
15 time in which to file the Opening Brief and Appendix herein until Monday, July
16 20, 2020. Alternatively, assuming all parties ultimately agree, the parties intend to
17 file a joint motion to remand this matter.
- 18 5. This stipulation is made in good faith and not for purpose of delay.

19 Dated this 18th day of June, 2020.

20 ROGER P. CROTEAU &
21 ASSOCIATES, LTD.

LAW OFFICES OF KEVIN R. HANSEN

22 /s/ Timothy E. Rhoda
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22 /s/ Amy M. Wilson
23 KEVIN R. HANSEN, ESQ.
24 Nevada Bar No. 6336
25 AMY M. WILSON, ESQ.
26 Nevada Bar No. 13421
27 5440 West Sahara Avenue, Suite 206
Las Vegas, Nevada 89146
Attorney for Respondents
EZ Properties, LLC and K&L Baxter Family
Partnership

AKERMAN, LLP

MAURICE WOOD

/s/ Lilith V. Xara

LILITH V. XARA, ESQ.

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1635 Village Center Circle, Suite 200

Las Vegas, Nevada 89134

Attorney for Respondents

***Bank of America, N.A. and Recontrust
Company***

/s/ Brittany Wood

AARON R. MAURICE, ESQ.

Nevada Bar No. 6412

BRITTANY WOOD, ESQ.

Nevada Bar No. 7562

9525 Hillwood Drive, Suite 140

Las Vegas, Nevada 89134

Attorney for Respondents

***James R. Blaha and Noble Home Loans
formerly known as FCH Funding, Inc.***

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of ROGER P. CROTEAU & ASSOCIATES, LTD.
and that on the 18th day of June, 2020, I caused a true and correct copy of the foregoing
document to be served on all parties as follows:

X VIA ELECTRONIC SERVICE: through the Nevada Supreme Court's efile e-file and
serve system.

____ VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with
postage thereon fully prepaid, addressed as indicated on service list below in the United
States mail at Las Vegas, Nevada.

____ VIA FACSIMILE: by causing a true copy thereof to be telecopied to the number indicated
on the service list below.

____ VIA PERSONAL DELIVERY: by causing a true copy hereof to be hand delivered on this
date to the addressee(s) at the address(es) set forth on the service list below.

/s/ Timothy E. Rhoda

An employee of ROGER P. CROTEAU &
ASSOCIATES, LTD.