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PENNYMAC HOLDINGS, LLC

IN THE SUPREME COURT OF THE STATE OF NEVADA

TRACY LEE CASTL,

Appellant,

vs.

PENNYMAC HOLDINGS, LLC,

Respondent.

* * *

Supreme Court No. 82296

District Ct. No. A742267

**OPPOSITION TO
APPELLANT'S FIFTH
MOTION FOR EXTENSION
OF TIME TO FILE OPENING
BRIEF**

MEMORANDUM OF POINTS AND AUTHORITIES

Appellant has effectively used the legal system to avoid making a single payment on her \$2,250,000 loan ("Loan") for more than thirteen years. Since 2008, when Appellant first defaulted on her Loan, Appellant has initiated two quiet title actions, filed three bankruptcies, participated in an NRS Chapter 107 foreclosure mediation, filed a Petition for Judicial Review in connection with the foreclosure mediation and, thereafter, appealed the District Court's Order Denying Appellant's Petition for Judicial Review to the Nevada Court of Appeals.

Throughout this ordeal, Appellant has not made a single loan payment. This case marks Appellant's *seventh* legal action filed to delay the foreclosure. While each of Appellant's previously filed actions were unsuccessful, they satisfied Appellant's true objective: indefinitely delaying PennyMac's right to foreclose.

In each of Appellant's four prior requests for an extension, this Court has cautioned: "no further extensions of time shall be granted absent demonstration of extraordinary circumstances and extreme need." Appellant incorporates its Opposition to Appellant's prior requests for extensions and urges this Court to deny Appellant's fifth request for an extension. It is time for this Court to hold Appellant accountable. Appellant's abuse of the legal system must end. Accordingly, this Court should reject Appellant's fifth request for an extension.

DATED this 16th day of February, 2022.

MAURICE WOOD

By /s/Brittany Wood

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Maurice Wood, and that on the 16th day of February, 2022, I caused to be served a true and correct copy of the foregoing **OPPOSITION TO APPELLANT'S FIFTH MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF** to the Supreme Court of Nevada's electronic docket for filing and service upon the following:

Law Offices of Byron Thomas
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/s/ Brittany Wood
An Employee of MAURICE WOOD