

AARON R. MAURICE, ESQ.  
Nevada Bar No. 6412  
BRITTANY WOOD, ESQ.  
Nevada Bar No. 7562  
ELIZABETH E. ARONSON, ESQ.  
Nevada Bar No. 14472  
**MAURICE WOOD**  
8250 West Charleston Boulevard, Suite 100  
Las Vegas, Nevada 89117  
Telephone: (702) 463-7616  
Facsimile: (702) 463-6224  
E-Mail: amaurice@mauricewood.com  
bwood@mauricewood.com  
earonson@mauricewood.com

Attorneys for Respondent,  
PENNYMAC HOLDINGS, LLC

Electronically Filed  
Mar 07 2022 07:13 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

**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 SIXTH  
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. This case marks Appellant's *seventh* legal action filed to delay the foreclosure of the property that acts as security for the Loan. While each of Appellant's previously filed actions were unsuccessful, they satisfied Appellant's true objective: indefinitely delaying PennyMac's right to foreclose.

In this action, Appellant continues the pattern of delay through her multiple requests for extensions – extensions that have caused this appeal to drag on for more than a year without an opening brief filed. In each of Appellant’s five 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.” Yet, even when this Court has “denied” Appellant’s request for yet another extension, this Court has nonetheless granted Appellant additional time to file an opening brief and appendix thereby effectively granting Appellant the relief she seeks – delaying the foreclosure indefinitely. PennyMac incorporates its Oppositions to Appellant’s prior requests for extensions and urges this Court to deny Appellant’s sixth request for an extension entirely.

It is time for this Court to hold Appellant accountable and dismiss this appeal for Appellant’s failure to timely file an opening brief and an appendix. See NRAP 31(d)(1). Appellant’s abuse of the legal system must end.

DATED this 7<sup>th</sup> day of March, 2022.

**MAURICE WOOD**

By /s/Brittany Wood

AARON R. MAURICE, ESQ.

Nevada Bar No. 006412

BRITTANY WOOD, ESQ.

Nevada Bar No. 007562

ELIZABETH E. ARONSON, ESQ.

Nevada Bar No. 14472

8250 West Charleston Blvd., Ste. 100

Las Vegas, Nevada 89117

Attorneys for Respondent

## CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Maurice Wood, and that on the 7<sup>th</sup> day of March, 2022, I caused to be served a true and correct copy of the foregoing **OPPOSITION TO APPELLANT’S SIXTH 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  
BYRON E. THOMAS, ESQ.  
3275 S. Jones Blvd. Ste. 104  
Las Vegas, Nevada 89146

/s/ Brittany Wood  
An Employee of MAURICE WOOD