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Elizabeth A. Brown
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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 SEVENTH
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 six 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 seventh 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 24th day of March, 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 24th day of March, 2022, I caused to be served a true and correct copy of the foregoing **OPPOSITION TO APPELLANT’S SEVENTH 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:

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/s/ Brittany Wood
An Employee of MAURICE WOOD