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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 In re:) Case No. 2:16-cv-00060-JAD-GWF
10)
AMERI-DREAM REALTY, LLC,)
11) Bankruptcy Case No.: 15-10110-LED
Debtor.)
12) Chapter 7
_____)
13 VICTORIA NELSON, In Her Capacity As The)
Chapter 7 Trustee Of AMERI-DREAM)
REALTY, LLC,)
14) Plaintiff,)
15) Adv. Proceeding No.: 15-01183-LED
v.)
16)
XL AMERICA, INC.; XL INSURANCE) **STIPULATION AND ORDER**
17) **CONTINUING BRIEFING**
AMERICA, INC.; XL SELECT) **DEADLINES**
18)
PROFESSIONAL; PEARL INSURANCE)
19) GROUP, LLC; GREENWICH INSURANCE)
COMPANY; and DOES I through X; and ROE)
CORPORATE DEFENDANTS XI through)
20) XX,)
Defendants.)
_____)
21)

22 Plaintiff, Victoria Nelson, in her capacity as the Chapter 7 Trustee of Ameri-Dream
23 Realty, LLC (the “**Plaintiff**”), by and through her attorneys of record Schwartz Flansburg PLLC,
24 and XL America, Inc., XL Insurance America, Inc., XL Select Professional, Pearl Insurance
25 Group, LLC, Greenwich Insurance Company (collectively, the “**Defendants**”), by an through
26

1 their attorneys of record, Wilson Elser Moskowitz Edelman & Dicker LLP, hereby stipulate and
2 agree as follows:

3 WHEREAS, on November 15, 2016, this Court entered an order granting Defendants'
4 motion to withdraw the reference from bankruptcy court to this Court;

5 WHEREAS, on December 22, 2016, the Plaintiff filed her Motion for Summary
6 Judgment (the "MSJ") against all Defendants;

7 WHEREAS, on December 27, 2016, the Defendants XL America, Inc., XL Insurance
8 America, Inc., XL Select Professional and Pearl Insurance Group, LLC filed their Motion to
9 Dismiss the Complaint, and that same day, Defendant Greenwich Insurance Company filed its
10 Motion to Dismiss the Complaint (collectively, the "MTDs");
11

12 WHEREAS, the current deadline for Plaintiff to file an opposition to the MTDs is
13 January 10, 2017, and the deadline for Defendants to file an opposition to the MSJ is January
14 12, 2017; and

15 WHEREAS, the parties desire to extend the briefing deadlines as set forth herein.

16 NOW, THEREFORE, the Plaintiff and Defendants hereby stipulate and agree to the
17 following, and concurrently seek this Court's approval of the same.

18 IT IS HEREBY STIPULATED AND AGREED that Plaintiff's deadline to file an
19 opposition to the MTDs shall be January 13, 2017; and

20 IT IS FURTHER STIPULATED AND AGREED that Defendants' deadline to file an
21 opposition to the MSJ shall be January 17, 2017; and

22 IT IS FURTHER STIPULATED AND AGREED that Defendants' deadline to file a
23 reply to Plaintiff's opposition to the MTDs shall be two weeks after the opposition is filed, or
24 January 27, 2017; and
25
26

1 IT IS FURTHER STIPULATED AND AGREED that Plaintiff's deadline to file a reply
2 to Defendants' opposition to the MSJ shall be two weeks after the opposition is filed, or January
3 31, 2017.

4 Date: January 9, 2017

Date: January 9, 2017

5 By: /s/ Samuel A. Schwartz
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By: /s/ Jennifer W. Arledge
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Attorneys for Defendants

12
13 **IT IS SO ORDERED.**

14 Dated this _____ day of January, 2017.

15
16 _____
17 DISTRICT COURT JUDGE

18
19 Submitted by:

20 Schwartz Flansburg PLLC

21 By: /s/ Samuel A. Schwartz
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