

**Snell & Wilmer**  
L.L.P.

LAW OFFICES  
3883 HOWARD HUGHES PARKWAY, SUITE 1100  
LAS VEGAS, NEVADA 89169  
(702)784-5200

1 Andrew M. Jacobs, Esq.  
Nevada Bar No. 12787  
2 Blakeley E. Griffith, Esq.  
Nevada Bar No. 12386  
3 Wayne Klomp, Esq.  
Nevada Bar No. 10109  
4 SNELL & WILMER L.L.P.  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
5 Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
6 Email: [ajacobs@swlaw.com](mailto:ajacobs@swlaw.com)  
[bgriffith@swlaw.com](mailto:bgriffith@swlaw.com)  
7 [wklomp@swlaw.com](mailto:wklomp@swlaw.com)  
8 *Attorneys for Wells Fargo Bank, N.A.*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 FIRST 100, LLC a Nevada limited-liability  
12 company;  
13 **Plaintiff,**  
14 vs.  
15 WELLS FARGO BANK, N.A., a national  
16 association; MTC FINANCIAL, INC. d/b/a  
17 TRUSTEE CORPS, a foreign corporation;  
18 CITY OF LAS VEGAS, a political  
19 subdivision; DOES I through X; and ROE  
CORPORATIONS I through X, inclusive;  
20 **Defendants.**

Case No.: 2:13-cv-00431-JCM-PAL

**STIPULATION AND ORDER FOR AN  
EXTENSION OF TIME TO FILE A  
RESPONSIVE PLEADING TO  
PLAINTIFF’S COMPLAINT**

**(Second Request)**

20 It is hereby stipulated by and between Defendant, Wells Fargo Bank, N.A. (“Wells  
21 Fargo”) through its attorneys, the law firm of Snell & Wilmer L.L.P., and Plaintiff, First 100, LLC  
22 (“First 100”), through its attorneys, the law firm of Maier Gutierrez Ayon, as follows:

23 Pursuant to the Stipulation and Order for an Extension of Time to File a Responsive  
24 Pleading to Plaintiff’s Complaint (Dkt. #50) filed on October 19, 2015, Wells Fargo’s response to  
25 First 100’s Complaint on file herein is due Thursday, November 5, 2015. This matter has recently  
26 been remanded to this Court from the Ninth Circuit Court of Appeals for further proceedings.  
27 Based upon the fact that this case presents unique facts affecting the procedural posture of the  
28 case about which the Parties are in discussions, Wells Fargo and First 100 stipulate and agree that

1 Wells Fargo shall have until December 5, 2015, in which to file a response to the Complaint.  
2 This is the Parties' second request for an extension of time to respond to the Complaint and is not  
3 intended to cause any delay or prejudice to any party. Rather the request is made to give the  
4 Parties time to adequately address the current procedural posture of the case and for potential  
5 settlement discussions.

6 DATED this 5th day of November 2015.

DATED this 5th day of November 2015.

7 SNELL & WILMER L.L.P.

MAIER GUTIERREZ AYON

9 By: /s/ Wayne Klomp

By: /s/ Luis A. Ayon

10 Andrew M. Jacobs, Esq.  
11 Nevada Bar No. 12787  
12 Blakeley E. Griffith, Esq.  
13 Nevada Bar No. 12386  
14 Wayne Klomp, Esq.  
15 Nevada Bar No. 10109  
16 3883 Howard Hughes Parkway, Suite 1100  
17 Las Vegas, NV 89169  
18 Telephone: (702) 784-5200  
19 Facsimile: (702) 784-5252  
20 *Attorneys for Defendant Wells Fargo Bank*

Luis A. Ayon, Esq.  
Nevada Bar No. 9752  
Margaret E. Schmidt, Esq..  
Nevada Bar No. 12489  
400 So. Seventh Street, Suite 400  
Las Vegas, NV 89101  
Telephone: (702) 629-7900  
Facsimile: (702) 629-7925  
*Attorneys for Plaintiff First 100, LLC*

**ORDER**

IT IS SO ORDERED.

Dated this 9th day of November, 2015.

  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:

SNELL & WILMER L.L.P.

/s/ Wayne Klomp

Wayne Klomp, Esq.  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
*Attorneys for Wells Fargo Bank, N.A.*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2015, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court’s CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: November 5, 2015

/s/ Lara J. Taylor  
An Employee of Snell & Wilmer L.L.P.

**Snell & Wilmer**  
L.L.P.  
LAW OFFICES  
3883 HOWARD HUGHES PARKWAY, SUITE 1100  
LAS VEGAS, NEVADA 89169  
(702)784-5200