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

11 BOURNE VALLEY COURT TRUST,
12
13 Plaintiff,

Case No.: 2:13-cv-00649-JCM-GWF

14 vs.

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
OPPOSITION TO WELLS FARGO'S
MOTION FOR SUMMARY JUDGMENT
[ECF NO. 136]**

15 WELLS FARGO BANK, N.A.; MTC
FINANCIAL, INC., dba TRUSTEE CORPS;
16 RENEE JOHNSON; and NEVADA LEGAL
NEWS, LLC,
17 Defendants.

18 Plaintiff BOURNE VALLEY COURT TRUST (“**Bourne Valley**”) and WELLS FARGO
19 BANK, N.A. (“**Wells Fargo**”) (collectively, the “**Parties**”), through their undersigned counsel of
20 record, hereby respectfully request the Court enter an order, pursuant to Local Rules IA 6-1 and
21 26-4, extending the date for Bourne Valley to file its response to Wells Fargo’s motion for
22 summary judgment [ECF No. 136] from its current due date of Wednesday, April 18, 2018, to
23 **May 2, 2018**. This is the first request to extend the deadline to respond to Wells Fargo’s motion
24 for summary judgment.

25 On March 28, 2018, Wells Fargo filed its motion for summary judgment based on 12
26 U.S.C. § 4617(j)(3), Freddie Mac’s interest in the subject property, the servicing relationship
27 between Freddie Mac and Wells Fargo, and the lack of consent to the foreclosure by the Federal
28

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1 Housing Finance Agency (“FHFA”) [ECF No. 136]. Bourne Valley’s opposition to the motion is
2 currently due on Wednesday, April 18, 2018.

3 **I. Good Cause Exists for Extending the Deadline to Respond to Wells Fargo’s Motion**

4 The deadline the Parties seek to extend has not expired. This Stipulation is made for the
5 benefit and convenience of the Parties. This request is not made for any deleterious purpose or to
6 cause delay, but is made in good faith by the Parties.

7 **II. Proposed Schedule**

8 The Parties respectfully request that the Court grant this Stipulation and extend the deadline
9 for Bourne Valley to respond to Wells Fargo’s motion for summary judgment to May 2, 2018.

10
11 DATED this 18th day of April, 2018.

DATED this 18th day of April, 2018.

12 **KIM GILBERT EBRON**

SNELL & WILMER, LLP

13 /s/Jacqueline A. Gilbert
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19
20 **IT IS SO ORDERED**

21 
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: April 19, 2018

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CERTIFICATE OF SERVICE

1 I HEREBY CERTIFY that on this 18th day of April 2018, pursuant to FRCP 5, I served
2 via the CM-ECF electronic filing system the foregoing **STIPULATION AND ORDER TO**
3 **EXTEND DEADLINE TO FILE OPPOSITION TO WELLS FARGO’S MOTION FOR**
4 **SUMMARY JUDGMENT [ECF NO. 136]**

5
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