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

12 BOURNE VALLEY COURT TRUST,
13
14 Plaintiff,
15 vs.
16 WELLS FARGO BANK, N.A.; MTC
FINANCIAL, INC., dba TRUSTEE
17 CORPS; RENEE JOHNSON; and
NEVADA LEGAL NEWS, LLC
18
19 Defendant.

CASE NO.: 2:13-CV-00649-JCM-GWF

**STIPULATION AND ORDER TO
COORDINATE BRIEFING
SCHEDULES ON MOTIONS FOR
SUMMARY JUDGMENT**
(First Request)

21 Wells Fargo Bank, N.A. (“Wells Fargo”) and Bourne Valley Court Trust (“Bourne
22 Valley”, and with Wells Fargo, the “Parties”) through their counsel of record hereby respectfully
23 request the Court enter an order, pursuant to Local Rules IA 6-1 and 7-1, coordinating the
24 briefing schedules on Wells Fargo’s Motion for Summary Judgment filed on (ECF No. 136) and
25 Bourne Valley’s Motion for Summary Judgment filed on (ECF No. 153). The Parties request that
26 any response to the Motions for Summary Judgment be extended to **November 19, 2018**.
27 Currently, Wells Fargo’s response is due October 19, 2018. Bourne Valley’s response is due
28

1 November 22, 2018. Additionally, because the Parties would then be required to draft a reply
2 over the Thanksgiving holiday, the Parties agree that deadline for any reply should be extended
3 from December 3, 2018 to **December 10, 2018**.

4 Wells Fargo filed its Motion for Summary Judgment on March 28, 2018 (ECF NO. 136).
5 The Parties then stipulated to extend the time for Bourne Valley to respond to Wells Fargo's
6 motion until May 2, 2018—this was granted on April 19, 2018. Order (ECF No. 138).
7 Thereafter, Bourne Valley moved to extend its time to respond to Wells Fargo's Motion for
8 Summary Judgment until after the Court considered Bourne Valley's the Court granted Bourne
9 Valley's request to extend its time to respond to Wells Fargo's Motion for Summary Judgment
10 until after the Court ruled on a motion by non-party Federal Home Loan Mortgage Corporation's
11 ("Freddie Mac") motion to reconsider the order denying Freddie Mac's motion for protective
12 order. Motion to Extend Deadline (ECF No. 139).

13 On May 3, 2018, the Court granted Bourne Valley's request, extending its time to respond
14 to Wells Fargo's Motion for Summary Judgment "to sixty days after the court issues an order on
15 Freddie Mac's motion to reconsider the Magistrate Judge's denial of Freddie Mac's motion for
16 protective order (ECF No. 133)." *See* Order at 2 (ECF No. 141). On July 17, 2018, the
17 Magistrate Judge entered an order granting Wells Fargo's motion to stay discovery. Order (ECF
18 No. 148). On September 20, 2018, the Court issued an order denying Freddie Mac's motion for
19 reconsideration, thereby triggering Bourne Valley's deadline to respond to Wells Fargo's Motion
20 for Summary Judgment. Order (ECF No. 152). Bourne Valley's response to Wells Fargo's
21 Motion for Summary Judgment is now due November 19, 2018.

22 On September 28, 2018, Bourne Valley filed its own Motion for Summary Judgment
23 (ECF No. 153), and Wells Fargo's response is currently due October 19, 2018.

24 In an effort to coordinate the briefing schedules on the multiple motions for summary
25 judgment, the Parties agree and stipulate that any response to the now-pending summary
26 judgment motions (ECF Nos. 138, 153) shall be due by **November 19, 2018**, and any reply will
27 be due **December 10, 2018**.

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This Stipulation and extension is made by the Parties in good faith. The Stipulation is made for the benefit and convenience of the Parties and not for any deleterious purpose. The extension is not intended to delay the proceedings nor cause any prejudice to either party.

DATED this 17th day of October, 2018.

DATED this 17th day of October, 2018.

KIM GILBERT EBRON

SNELL & WILMER L.L.P.

By: /s/ Diana S. Ebron

By: /s/ Wayne Klomp

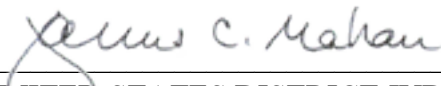
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Attorneys for Bourne Valley Court Trust

Attorneys for Wells Fargo Bank, N.A.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: October 18, 2018

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing document by the method indicated below:

<u>XXXX</u>	Electronic Service (CM/ECF)	_____	Federal Express
_____	U.S. Mail	_____	U.S. Certified Mail
_____	Facsimile Transmission	_____	Hand Delivery
_____	Email Transmission	_____	Overnight Mail

and addressed to the following:

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DATED this 17th day of October, 2018.

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

4824-2529-8808