

Snell & Wilmer
LLP
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 Kelly H. Dove, Esq.
Nevada Bar No. 10569
3 Wayne Klomp, Esq.
Nevada Bar No. 10109
4 SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
5 Las Vegas, NV 89169
Tel. (702) 784-5200
6 Fax. (702) 784-5252
ajacobs@swlaw.com
7 kdove@swlaw.com
wklomp@swlaw.com

8 *Attorneys for Wells Fargo Bank, N.A.*

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
EXTEND DEADLINE TO RESPOND TO
BOURNE VALLEY’S
COUNTERMOTION FOR FRCP 56(d)
RELIEF IN THE ALTERNATIVE
(First Request)**

20 Wells Fargo Bank, N.A. (“Wells Fargo”) and Bourne Valley Court Trust (“Bourne
21 Valley”, and with Wells Fargo, the “Parties”) through their counsel of record hereby respectfully
22 request the Court enter an order, pursuant to Local Rules IA 6-1 and 7-1, extending the time for
23 Wells Fargo to file its response to Bourne Valley’s Counter-motion for FRCP 56(d) Relief in the
24 Alternative (“Counter-motion” ECF No. 158) from its current due date of December 3, 2018, until
25 **Tuesday, December 11, 2018.**

26 Bourne Valley’s Counter-motion was filed in conjunction with its Response (ECF No.
27 157) to Wells Fargo’s Motion for Summary Judgment (ECF No. 136). Upon the filing of Bourne
28

1 Valley’s Motion for Summary Judgment (ECF No. 153), the Parties stipulated to coordinate the
2 briefing of their respective motions for summary judgment. See Stipulation and Order to
3 Coordinate Briefing Schedules (ECF No. 154). The Court ordered the Parties to file their replies
4 in support of their respective motions for summary judgment by December 10, 2018. Order (ECF
5 No. 155). Because Bourne Valley’s Countermotion relates to and contains arguments related to
6 Wells Fargo’s Motion for Summary Judgment, the Parties stipulate and agree that Wells Fargo
7 can file its response to the Countermotion with its reply in support of its motion for summary
8 judgment, currently due December 10, 2018.

9 This stipulation and extension is made by the Parties in good faith. The Stipulation is
10 made for the benefit and convenience of Wells Fargo and not for any deleterious purpose. The
11 extension is not intended to delay the proceedings.

12 DATED this 3rd day of December, 2018.

DATED this 3rd day of December, 2018.

13 KIM GILBERT EBRON

SNELL & WILMER L.L.P.

14 By: /s/ Jacqueline A. Gilbert

By: /s/ Wayne Klomp

15 Diana S. Ebron, Esq.
16 Nevada Bar No. 10580
17 Jacqueline A. Gilbert, Esq.
18 Nevada Bar No. 10593
19 Karen L. Hanks, Esq.
20 Nevada Bar No. 9578
21 7625 Dean Martin Drive, Suite 110
22 Las Vegas, NV 89139

Andrew M. Jacobs, Esq.
Nevada Bar No. 12787
Kelly H. Dove, Esq.
Nevada Bar No. 10569
Wayne Klomp, Esq.
Nevada Bar No. 10109
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169

23 *Attorneys for Bourne Valley Court Trust*

Attorneys for Wells Fargo Bank, N.A.

24
25 **IT IS SO ORDERED.**

26 
27 UNITED STATES DISTRICT JUDGE

28 DATED: December 3, 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:

Diana S. Ebron, Esq.
Jacqueline A. Gilbert, Esq.
Karen L. Hanks, Esq.
KIM GILBERT EBRON
7625 Dean Martin Dr., Ste. 110
Las Vegas, NV 89139-5974
Telephone: (702) 485-3300
Fax: (702) 485-3301

Attorneys for Bourne Valley Court Trust

DATED this 3rd day of December, 2018.

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

4822-3024-1409