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5  
 6 **UNITED STATES DISTRICT COURT**  
 7 **DISTRICT OF NEVADA**

8 WELLS FARGO BANK, N.A., a national  
 banking association,

9 Plaintiff,

Case No.: 2:13-cv-1472-GMN-NJK

10 vs.

11 ALIREZA KAVEH, an individual; ALIREZA  
 12 KAVEH, as Trustee of the Alireza Kaveh  
 Family Trust; JPA INVESTMENTS, LLC, a  
 Nevada limited liability company, JOCELYNE  
 13 ABRAR, an individual; JOCELYNE ABRAR  
 as Trustee of The Jocelyne Abrar Trust; ALI  
 14 KAVEH aka Alireza Kaveh, Sr., an individual;  
 MOLOUK KAVEH; and MOLOUK KAVEH,  
 15 as Trustee of The Kaveh Family Trust,

Date:  
 Time:

16 Defendants.

17 **STIPULATION RE EXPERT REPORT AND DISCOVERY EXTENSION**  
 18 **(FIRST REQUEST)**

19 IT IS HEREBY STIPULATED by and between Richard McKnight, Esq. non behalf of  
 20 Defendants, JPA Investments, LLC, Jocelyne Abrar, Jocelyne Abrar as Trustee of The  
 21 Jocelyne Abrar Trust; Ali Kaveh aka Alireza Kaveh, Sr. and Molouk Kaveh, Michael Lynch  
 22 Esq. on behalf of Plaintiff Wells Fargo and Ali Kaveh in proper person, as follows:

23 Excusable neglect: Excusable neglect -- Pursuant to LR 26-4, the Parties respectfully  
 24 submit that the following factors constitute excusable neglect for failing to request an  
 25 extension of the expert disclosure deadline at least 21 days prior to its expiration on January  
 26 22, 2015. This is an action against personal guarantors of a commercial loan secured by real  
 27 property. The real property securing that loan is under the control of a court-appointed

1 receiver, and was scheduled for a foreclosure sale set for February 4, 2015. During the week  
2 of January 19, 2015, however, it was discovered that the February 4th foreclosure date would  
3 need to be moved based upon information provided by the receiver that certain construction  
4 and improvements underway at the property will not be completed until approximately the end  
5 of March , 2015. Upon information and belief, the completion of this work prior to  
6 foreclosure is likely to result in a higher sale price at the foreclosure sale, and that all parties  
7 would benefit from a continuation of the sale date. As the new foreclosure date will affect the  
8 date of value to be used in the trial of this matter, the recent discovery of the need to continue  
9 the foreclosure date constitutes excusable neglect for the delay in requesting this extension.

10 Due to the fact that two of the three claims for relief in this matter are going to be  
11 dismissed (see status report file herewith) and the aforementioned construction delay, the  
12 parties did not apply for extension 21 days in advance of expiration of discovery.

13 Discovery remaining: Once the foreclosure is accomplished in this matter it will be  
14 necessary to hire expert appraisers to determine the value of the property so that the value can  
15 be contrasted with the amount claimed to be owed under the promissory note. As such:

16 Defendants' initial expert report regarding value of the property shall be due on Friday,

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1 May 8, 2015. Plaintiff's expert report shall be due on Monday, June 8, 2015. Defendants'  
2 rebuttal expert report shall be due Friday, June 19, 2015.

3 IT IS SO STIPULATED. IT IS SO STIPULATED.

4 Dated this 26<sup>th</sup> day of January 2015. Dated this 26<sup>th</sup> day of January 2015.

5 LYNCH LAW PRACTICE, PLLC THE MCKNIGHT LAW FIRM, PLLC

6  
7 By: /s/ Michael F. Lynch By: /s/ Richard McKnight  
8 Michael F. Lynch, Esq. Richard McKnight, Esq.  
9 Nevada Bar No.: 8555 Nevada Bar No.: 1313  
10 8275 S. Eastern Ave., Suite 200 528 S. Casino Center Blvd., #335  
11 Las Vegas, NV 89123 Las Vegas, Nevada 89101  
12 *Attorneys for Wells Fargo Bank, N.A.* *Attorneys for Jocelyne Abrar, Ali Kaveh,*  
13 *Moluck Kaveh and JPA Investments, LLC*

11 IT IS SO STIPULATED.

12 Dated this 26<sup>th</sup> day of January 2015.

13  
14 By: /s/ Alireza Kaveh  
15 Alireza Kaveh aka Kaveh Jr.  
16 6830 S. Rainbow, Suite 200F  
17 Las Vegas, Nevada 89118  
18 *Pro Se*

17 **IT IS SO ORDERED**

18 DATED this 27<sup>th</sup> day of January 2015.

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21 UNITED STATES MAGISTRATE JUDGE