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10	DISTRICT OF NEVADA	
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12	LN MANAGEMENT LLC SERIES 7241	Case No. 2:14-cv-01936-APG-GWF
13	BROOK CREST,	WELLS FARGO'S REQUEST FOR
	Plaintiff,	LEAVE TO HAVE CLIENT
14	NO.	REPRESENTATIVE PARTICIPATE BY PHONE IN SETTLEMENT
15	vs.	CONFERENCE
16	BRANDON JHUN, et al.,	
10	Defendants.	
17		

Pursuant to the Court's Order Scheduling a Settlement Conference (Doc. 36), Wells Fargo hereby respectfully requests a limited exception to the Court's attendance requirements for the settlement conference scheduled to commence at 9:00 a.m. on Thursday, April 7, 2016. Specifically, to accommodate the fact that Wells Fargo's representative with authority to settle this case is not located in or near the State of Nevada, Wells Fargo requests permission to allow its representative to participate in the conference by phone as necessary. The grounds for this request are set forth further below.

First, Wells Fargo takes this process and the Court's procedures very seriously, and intends to participate in this conference in good faith. In addition, Wells Fargo's outside counsel will attend the settlement conference in person. However, as a logistical matter, Wells Fargo's corporate representative responsible for this case is located in Charlotte, North Carolina. That

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Snell & Wilmer

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1 individual is also charged not only with responsibility for this case, but for many other properties 2 facing similar and other litigation throughout Nevada and elsewhere. As a result, attendance in 3 person at the conference would require the commitment of part or all of three days.

4 Second, Wells Fargo contacted counsel for all parties, each of whom indicated they have no objection to Wells Fargo's corporate representative appearing at the settlement conference 5 6 telephonically.

Third, as counsel for Wells Fargo communicated to the Court during the telephonic conference on January 20, 2016, Wells Fargo anticipates that this case, like most other similar 9 cases, will be determined based on the Court's determination of legal issues relating to the HOA's 10 purported foreclosure sale. In the absence of a settlement in this case, Wells Fargo will be filing a dispositive motion on these issues. But Wells Fargo agrees with the other parties that the 12 potential resolution of the United States' interest in the property by settlement with LN Management would help to advance this case and clarify the remaining issues.

Accordingly, Wells Fargo respectfully requests that it be allowed leave to participate in good faith in the conference telephonically, without requiring in-person attendance.

Respectfully submitted this 23rd day of March, 2016.

SNELL & WILMER L.L.P.

/s/ Tanya N. Peters AMY F. SORENSON JARED C. FIELDS TANYA N. PETERS SNELL & WILMER L.L.P. 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169

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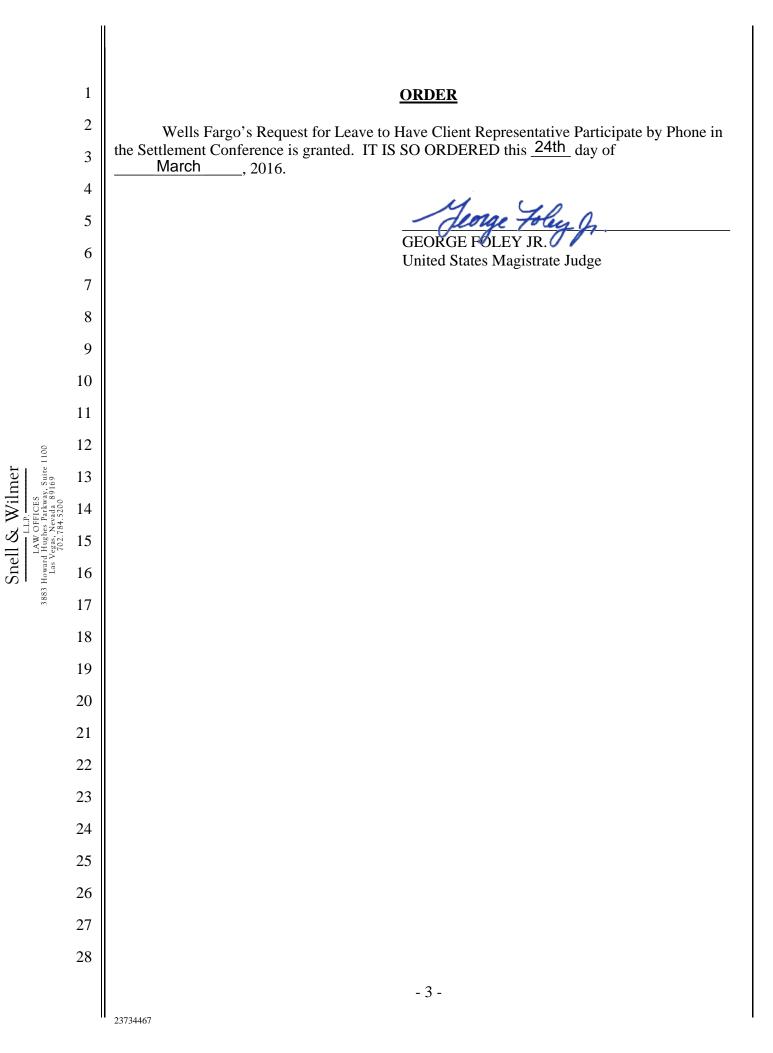
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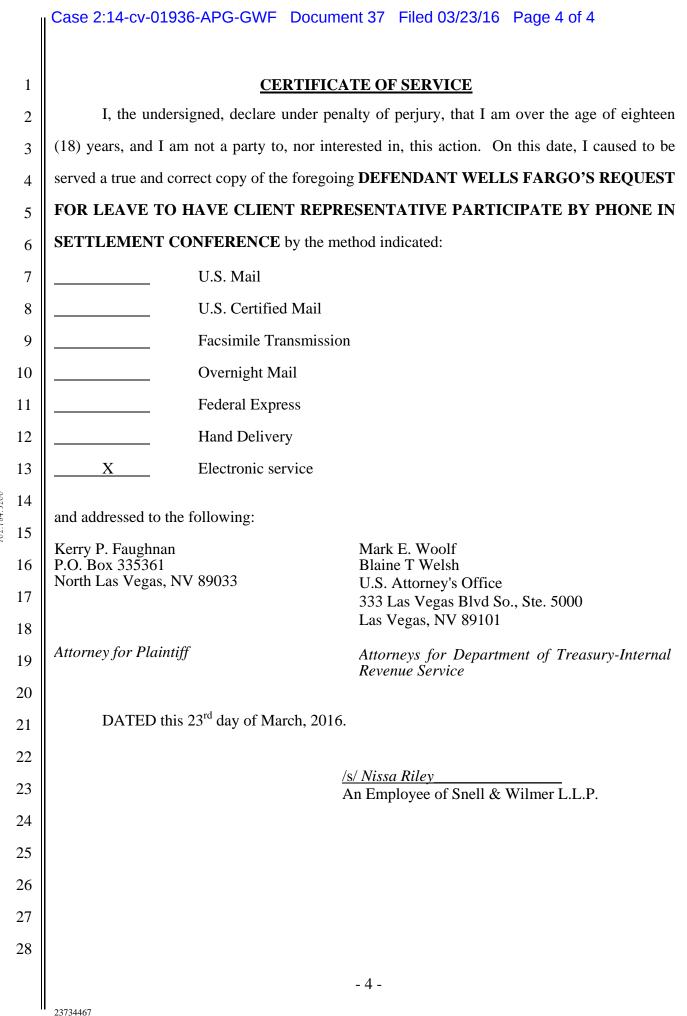
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