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13 *Attorneys for Defendant The Federal Savings Bank*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 PROFICIO MORTGAGE VENTURES, LLC,

Case No. 2:15-cv-00510-RFB-MDC

17 Plaintiff,

18 v.

19 THE FEDERAL SAVINGS BANK,

20 Defendant.

**STIPULATION AND ORDER TO
 EXTEND DEADLINE FOR DEFENDANT
 THE FIRST SAVINGS BANK TO: (1)
 RESPOND TO PLAINTIFF’S MOTION
 FOR ATTORNEYS’ FEES AND COSTS
 (ECF No. 328); AND (2) OBJECT TO
 PLAINTIFF’S BILLS OF COSTS (ECF
 Nos. 326, 327)**

(First Request)

21 Defendant The Federal Savings Bank (“TFSB”) respectfully requests that the Court extend
 22 the deadline for TFSB to file its response to PMV’s Motion for Attorneys’ Fees and Costs (ECF
 23 No. 328); and to Object to PMV’s Bills of Costs (ECF Nos. 326, 327) by sixty (60) days, from
 24 May 3, 2024 to July 3, 2024. Plaintiff Proficio Mortgage Ventures, LLC (“PMV”) consents to the
 25 requested extension. This is the first request to extend the deadline.

26 TFSB seeks the requested extension to account for a pre-scheduled out of the country
 27 vacation for Daniel Hefter, TFSB’s lead counsel, and TFSB’s expert retained for purposes of
 28 responding to the pending motion for fees, costs and prejudgment interest; and to permit time for
 TFSB to fully respond to the requested fees, costs and prejudgment interest sought by PMV, as

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well as object to the Bills of Costs. PMV has consented to the requested extension. The undersigned represent that this stipulation is not designed for purposes of delay.

DATED this 30th day of April, 2024.

McDONALD CARANO LLP

FOLEY & LARDNER LLP

By: /s/ Kristen T. Gallagher

By: /s/ Christi A. Lawson

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Attorneys for Defendant The Federal Savings Bank

Attorneys for Plaintiff Proficio Mortgage Ventures, LLC

IT IS SO ORDERED.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 5/2/2024