

1 JACOB D. BUNDICK, ESQ.
 2 Nevada Bar No. 9772
 bundickj@gtlaw.com
 3 GREENBERG TRAUERIG, LLP
 3773 Howard Hughes Parkway
 4 Suite 400 North
 Las Vegas, Nevada 89169
 5 Tel: (702) 792-3773 / Fax: (702) 792-9002

6 CHRISTI A. LAWSON, ESQ.
 clawson@foley.com
 (admitted *pro hac vice*)
 7 THOMAS S. CARGILL, ESQ.
 tcargill@foley.com
 (admitted *pro hac vice*)
 8 FOLEY & LARDNER LLP
 111 North Orange Ave., Suite 1800
 9 Orlando, Florida 32801-2386
 10 Tel: (407) 423-7656 / Fax: (407) 648-1743
 Counsel for Plaintiff
 11 Proficio Mortgage Ventures, LLC

12 **IN THE UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 PROFICIO MORTGAGE VENTURES,
 15 LLC,
 16 Plaintiff,
 17 v.
 18 THE FEDERAL SAVINGS BANK,
 19 Defendant.

Case No. 2:15-CV-510-RFB-(VCF)

**STIPULATION AND ~~PROPOSED~~
 ORDER TO CONTINUE HEARING
 ON MOTION FOR LEAVE TO
 REOPEN DEPOSITION**

21 Plaintiff, Proficio Mortgage Ventures, LLC (“Proficio”) and Defendant, The Federal
 22 Savings Bank (“TFSB”), by and through their undersigned attorneys, hereby stipulate and agree as
 23 follows:

24 The Parties respectfully request that the Court continue the hearing in the above-captioned
 25 case because the attorneys for the parties are conducting a deposition in the above-captioned case
 26 in Salt Lake City, Utah on the date previously set for the hearing of the above-referenced Motion.

1 The Parties propose the following two (2) alternative hearing dates: (i) August 9, 2016 or
2 (ii) August 10, 2016.

3 The Parties represent that this stipulation is sought in good faith, is not interposed for delay,
4 and is not filed for an improper purpose. The attorneys for the parties are conducting the
5 deposition of a witness in the above-referenced case in Salt Lake City, Utah at the current time this
6 matter is to be heard.

7 Respectfully submitted this 20th day of July, 2016.

8 GREENBERG TRAUERIG, LLP

GOZDECKI, DEL GIUDICE, AMERICUS,
FARKAS & BROCATO LLP

9 By: s/Jacob D. Bundick
10 JACOB D. BUNDICK, ESQ.
Nevada Bar No. 9772
11 3773 Howard Hughes Parkway, #400N
Las Vegas, Nevada 89169

By: s/Steven H. Leech
David S. Americus (*admitted pro hac vice*)
Steven H. Leech (*admitted pro hac vice*)
GOZDECKI, DEL GIUDICE, AMERICUS,
FARKAS & BROCATO LLP

12 CHRISTI A. LAWSON, ESQ.
13 (*admitted pro hac vice*)
Thomas S. Cargill, Esq.
14 (*pro hac vice pending*)
FOLEY & LARDNER LLP
15 111 North Orange Ave., Suite 1800
Orlando, Florida 32801-2386
16 *Counsel for Plaintiff*
Proficio Mortgage Ventures, LLC

One East Wacker Drive, Suite 1700
Chicago, IL 60601
Tel: 312.782.5010 / Fax: 312.782.4324
E-mail: d.americus@gozdel.com
s.leech@gozdel.com

Jeff Silvestri (#5779)
Joseph P. Schrage (#11270)
McDONALD CARANO WILSON LLP
2300 W. Sahara Avenue, Suite 1200
Las Vegas, NV 89102
Tel: 702.873.4100 / Fax: 702.874.9966
E-mail: jsilvestri@mcdonaldcarano.com
jschrage@mcdonaldcarano.com
Counsel for Defendant Federal Savings Bank

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

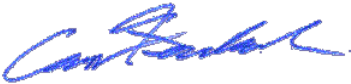
27 ///

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

IT IS SO ORDERED.



Dated: 7-21-2016

U.S. MAGISTRATE JUDGE

IT IS HEREBY ORDERED that the hearign scheduled for July 22, 2016 is VACATED and rescheduled to 1:00 p.m., August 10, 2016, in courtroom 3D.

SUBMITTED BY:

GREENBERG TRAURIG, LLP

By: /s/ Jacob D. Bundick
JACOB D. BUNDICK, ESQ.
(Nevada Bar No. 9772)
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169

CHRISTI A. LAWSON, ESQ.
(admitted *pro hac vice*)
THOMAS S. CARGILL, Esq.
(admitted *pro hac vice*)
FOLEY & LARDNER LLP
111 North Orange Ave., Suite 1800
Orlando, Florida 32801-2386

Counsel for Plaintiff
Proficio Mortgage Ventures, LLC