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11 Counsel for Defendant Federal Savings Bank

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 EXTEND DEADLINE
 TO FILE RESPONSES TO
 MOTIONS FOR SUMMARY
 JUDGMENT**

(First Request)

20
 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 **I. INTRODUCTION**

25 The parties respectfully request a 14 day extension of the deadline to file responses to the
 26 pending Motions for Summary Judgment, which were filed on January 27, 2017 (Dkts. 89 and 90).
 27 Pursuant to Local Rule of Civil Practice 6-1, the parties state as follows:
 28

1 **II. REASONS FOR EXTENSION**

2 The parties have filed lengthy Summary Judgment Motions that address issues central to
3 the case. The discovery record in this case is considerable, as the parties have conducted over 20
4 depositions and have produced over 58,000 pages of documents. In light of the importance and
5 complexity of the pending Motions for Summary Judgment, and the considerable discovery record
6 that must be reviewed in preparing responses to the Motions, as well as other professional
7 obligations of counsel (referenced below), the parties respectfully request a 14 day extension to the
8 deadline to file responses to the Motions for Summary Judgment. Such extension is not sought for
9 purposes of delay, but rather to provide the parties with adequate time to prepare responses to the
10 pending Motions for Summary Judgment.

11 The other obligations of counsel referenced above include Defendant's counsel's need to
12 prepare responses to dispositive motions in other cases, the need to prepare an appellant brief, and
13 issues involving requests for emergency injunctive relief.

14 **III. PROPOSED AMENDED SCHEDULE**

15 In light of the above, the parties stipulate and agree, subject to this Court's approval, to the
16 following schedule:

- 17 A. Responses to Motions for Summary Judgment. The deadline to file Responses to
18 the pending Motions for Summary Judgment (Dkts. 89 and 90) shall be extended to
19 **March 3, 2017.**

20 The Parties represent that this stipulation is sought in good faith, is not interposed for delay,
21 and is not filed for an improper purpose.

22
23 Respectfully submitted this 15th day of February, 2017.

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Counsel for Defendant Federal Savings Bank

ORDER

IT IS SO ORDERED.

17 Dated: February 16, 2017


RICHARD F. BOULWARE, II
United States District Judge

20 SUBMITTED BY:

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22 FARKAS & BROCATO LLP

24 By: /s Steven H. Leech

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