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7 *Attorneys for Augusta Belford and Ellingwood HOA*

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 BANK OF AMERICA, N.A.,  
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13 Plaintiff.  
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15 vs.  
16  
17 PREMIER ONE HOLDINGS, INC.;  
AUGUSTA BELFORD AND  
ELLINGWOOD HOMEOWNERS  
ASSOCIATION; DOE INDIVIDUALS I-X,  
inclusive, and ROE CORPORATIONS I-X,  
inclusive,  
18 Defendants.

CASE NO.: 2:15-CV-00860-JCM-NJK

**STIPULATION AND ORDER TO TAKE  
RULE 30(B)(6) DEPOSITION OF  
AUGUSTA BELFORD AND  
ELLINGWOOD HOMEOWNERS  
ASSOCIATION HOA OUTSIDE THE  
CLOSE OF DISCOVERY  
(FIRST REQUEST)**

18 IT IS HEREBY STIPULATED by and between the parties through their respective  
19 counsel to take the deposition of 30(b)(6) Witness for AUGUSTA BELFORD AND  
20 ELLINGWOOD HOMEOWNERS ASSOCIATION (“Augusta Belford”) on or before March  
21 29, 2016, outside the close of discovery. Discovery closes on March 9, 2016. The parties  
22 further stipulate and understand that the taking of this deposition outside the close of  
23 discovery will not affect or alter the any pending deadlines, the dispositive motions  
24 deadline or the joint pre-trial deadline. The parties are not seeking an extension of any  
25 deadlines.  
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**REASONS FOR NECESSITY OF STIPULATION**

Bank of America noticed Augusta Belford’s FRCP 30(b)(6) deposition to take place on March 8, 2016. August Belford timely notified Bank of America’s counsel that the Association’s designated witness was unavailable on the noticed date due to a prior commitment and is available later this month. In an effort to cooperate and accommodate the deponent’s schedule, the parties have agreed to conduct Augusta Belford’s FRCP 30(b)(6) deposition, on or before March 29, 2016. All other discovery has been completed or will be completed in this matter during the discovery period. This stipulation is made by the parties in good faith, not for the purpose of delay, and is also a professional courtesy to accommodate the deponent.

**DISCOVERY COMPLETED**

- |    |   |                  |
|----|---|------------------|
| 1) | Augusta Belford served written discovery  | November 4, 2015 |
| 2) | BANA served responses to Augusta Belford’s Written discovery                    | January 15, 2016 |
| 3) | BANA served written discovery on Augusta Belford And Premier One Holdings, Inc. | February 5, 2016 |

**DISCOVERY PENDING**

- |    |  |               |
|----|--|---------------|
| 1) | BANA deposition of Premier One Holdings, Inc. 30(b)(6) Witness | March 8, 2016 |
| 2) | BANA Deposition of Nevada Association Services, Inc.           | March 8, 2016 |
| 3) | Premier One Holdings, Inc. deposed 30(b)(6) Witness for BANA   | March 8, 2016 |

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This stipulation is made in good faith and not for purposes of delay.

DATED this 7<sup>th</sup> day of March, 2016.                      DATED this 7<sup>th</sup> day of March, 2016.

LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C.                      AKERMAN, LLP

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*Attorneys for Plaintiffs*

DATED this 7<sup>th</sup> day of March, 2016.

MORRIS & MORRIS

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**ORDER**

IT IS SO ORDERED.

DATED this 8th day of March, 2016.

  
UNITED STATES MAGISTRATE JUDGE