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

10 LAS VEGAS DEVELOPMENT GROUP, LLC,  
 a Nevada limited liability company,

Case No.: 2:15-cv-00917-GMN-NJK

11 Plaintiff,

**STIPULATION TO EXTEND REPLY  
 DEADLINE IN SUPPORT OF BANK OF  
 AMERICA, N.A.'S MOTION FOR  
 SUMMARY JUDGMENT**

12 vs.

**(SECOND REQUEST)**

13 2014-3 IH EQUITY OWNER, LP, a Delaware  
 14 limited partnership; BANK OF AMERICA, NA,  
 a National Banking Association; MERIDIAN  
 15 FORECLOSURE SERVICE, a California  
 corporation; THR NEVADA II, LP a Delaware  
 16 limited partnership; THR PROPERTY  
 BORROWER, LP, a Delaware limited  
 17 partnership; THR PROPERTY GUARANTOR,  
 LP, a Delaware limited partnership; THR  
 18 PROPERTY HOLDCO, LP, a Delaware limited  
 partnership; 2014-3 IH PROPERTY HOLDCO,  
 19 LP, a Delaware limited partnership; 2014-3 IH  
 BORROWER, LP, a Delaware limited  
 20 partnership; GERMAN AMERICAN CAPITAL  
 CORPORATION, a Maryland corporation;  
 21 CHRISTIANA TRUST, an unknown business  
 entity; DOE individuals I through XX; and ROE  
 22 CORPORATIONS I through XX,

23 Defendants.

24 Bank of America, N.A. (**BANA**) and THR Nevada II, LP (**THR2**), 2014-3 IH Borrower,  
 25 2014-13 IH Equity Owner, LP, THR Property Borrower, LP, THR Property Guarantor, LP, THR  
 26 Property Holdco, LP, and 2014-3 IH Property Holdco, LP (the THR and IH entities collectively,  
 27 **THR entities**) stipulate to extend BANA's deadline to reply to its summary judgment motion by one  
 28 week. [ECF No. 87].

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1 BANA filed its summary judgment motion on September 12, 2019. [Id.]. After several  
2 extensions and a settlement conference, the THR entities filed its response to the motion on May 7,  
3 2020. [ECF No. 126]. BANA's reply is presently due on June 11, 2020. [ECF No. 128]. If allowed  
4 a one-week extension, the deadline to reply would be June 18, 2020. This is the second request to  
5 extend this deadline.

6 Good cause exists to extend this deadline due to the complex and novel issues surrounding  
7 dual NRS 116 and 107 sales, including statute of limitations and alternative claims brought by 107-  
8 purchasers against financial institutions. Compounding these issues is the fact both BANA and the  
9 THR entities want the same outcome in this litigation: ownership vested in THR2's favor. Despite  
10 best efforts, BANA is unable to finalize the summary judgment reply by the present deadline as a  
11 result of these complex and novel issues. No party will be prejudiced by a one-week extension.

12 Dated June 10, 2020.

13 **AKERMAN LLP**

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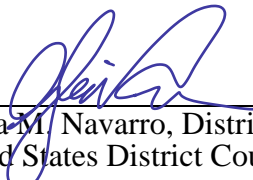
22 /s/ Frederick J. Biedermann  
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THR Nevada II, LP, THR Property Borrower,  
LP, THR Property Guarantor, LP, THR Property  
Holdco, LP, and 2014-3 IH Property Holdco, LP

**ORDER**

IT IS HEREBY ORDERED that the above stipulation to extend reply deadline in support of  
Bank of America, N.A.'s motion for summary judgment until June 18, 2020 is GRANTED.

Dated this 9 day of June, 2020.

  
Gloria M. Navarro, District Judge  
United States District Court