1	Michael Kind, Esq.	
2	NV Bar No. 13903 KAZEROUNI LAW GROUP, APC	
3	7854 W. Sahara Avenue	
4	Las Vegas, NV 89117 Phone: (800) 400-6808 x7	
5	FAX: (800) 520-5523	
6	mkind@kazlg.com	
7	David H. Krieger, Esq.	
8	NV Bar No. 9086 HAINES & KRIEGER, LLC	
9	8985 S. Eastern Avenue, Suite 350	
10	Henderson, Nevada 89123	
10	Phone: (702) 880-5554 FAX: (702) 385-5518	
11	dkrieger@hainesandkrieger.com	
12	Attorneys for Plaintiff,	
13 14	Carlos Flores-Ortiz	
14 15		
15 16		
10		S DISTRICT COURT
	DISTRICT	C OF NEVADA
18 19	Carlos Flores-Ortiz,	Case No: 2:15-cv-00939-RFB-GWF
20	Plaintiff,	
21	V.	STIPULATION AND PROPOSED
22	Bayview Financial, LP, et al,	ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO
23		RESPOND TO DEFENDANT'S
24	Defendants.	MOTION TO DISMISS [First
25		Request]
26		1
27		
28		
20		

STIPULATION AND PROPOSED ORDER

Plaintiff Carlos Flores-Ortiz ("Plaintiff"), Defendant Bank of America, N.A. ("BANA") (jointly as the "Parties"), by and through their respective counsel, hereby submit this stipulation for an extension of time for Plaintiff to respond to BANA's motion to dismiss [ECF No. 16].

6 WHEREAS, on May 19, 2015, Plaintiff filed in this Court a Complaint for
7 Damages, ECF No. 1;

8 WHEREAS, on December 1, 2015, BANA filed its Motion to Dismiss the
9 Complaint, ECF No. 16;

10 WHEREAS, a Response to BANA's Motion to Dismiss is due on December
11 18, 2015, ECF No. 16;

WHEREAS, the Parties are discussing the possible early resolution in this case and it is likely that the Parties will reach a settlement within 30 days.

WHEREAS, this is the first request for an extension of this deadline by theParties.

16 NOW, THEREFORE, in consideration of the foregoing, and for good cause,
17 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and
18 BANA as follows:

 Plaintiff shall have until January 17, 2015 to respond to BANA's Motion to Dismiss [ECF No. 16].

IT IS SO STIPULATED.

DATED this 18th day of December 2015.

[continued on next page]

1

2

3

4

5

12

13

19

20

21

22

23

24

25

26

27

28

Case No.: 2:15-cv-00939-RFB-GWF

1	
2	KAZEROUNI LAW GROUP, APC
3	By: <u>/s/ Michael Kind</u>
4	Michael Kind, Esq. 7854 W. Sahara Avenue
5	Las Vegas, NV 89117
6	800-400-6808 x7
7	Fax: 800-520-5523 Email: mkind@kazlg.com
8	Attorney for Plaintiff
9	AKERMAN LLP
10	By: <u>/S/ Matthew I Knepper</u>
11	Matthew I Knepper, Esq.
12	1160 Town Center Drive, Suite 330 Las Vegas, NV 89144
13	702-383-8966
14	Fax: 7026345000 Email: matthew.knepper@akerman.com
15	Attorney for Bank of America, N.A.
16	
17	IT IS SO ORDERED
18	R
19	
20	UNITED STATES DISTRICT JUDGE
21	
22	DATED: December 28, 2015
23	
24	
25	
26	
27	
28	

2

1	CERTIFICATION OF SERVICE	
2	I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil	
3	Procedure that on December 18, 2015, the foregoing STIPULATION AND	
4	PROPOSED ORDER FOR AN EXTENSION OF TIME FOR PLAINTIFF TO	
5	RESPOND TO DEFENDANT'S MOTION TO DISMISS [First Request] was	
6	served via CM/ECF to all parties appearing in this case.	
7		
8	KAZEROUNI LAW GROUP, APC	
9	By: <u>/s/ Michael Kind</u>	
10	Michael Kind	
11	7854 W. Sahara Avenue Las Vegas, NV 89117	
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		