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 8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 BANK OF AMERICA, N.A., successor by
 merger to BAC HOME LOANS SERVICING,
 12 LP FKA COUNTRYWIDE HOME LOANS
 SERVICING, LP

Case No.: 2:15-cv-01768-JCM-CWH

13 Plaintiff,

**STIPULATION TO CONTINUE
 DEADLINE FOR FILING PROPOSED
 PRE-TRIAL ORDER (Second Request)**

14 vs.

15 SFR INVESTMENTS POOL 1, LLC; DAVYN
 16 RIDGE HOMEOWNERS ASSOCIATION;
 THOMAS JESSUP, LLC; DOE
 17 INDIVIDUALS I-X, inclusive, and ROE
 CORPORATIONS I-X, inclusive,

18 Defendants.

19 and all related claims.
 20

21 Bank of America, N.A.; SFR Investments Pool 1, LLC; Davyn Ridge Homeowners
 22 Association; Thomas Jessup, LLC; and Daunshari Wong-Culotta hereby stipulate for a continuance
 23 of the deadline to file the proposed joint pre-trial order. This is the parties' second request for a
 24 continuance of this deadline.

25 Counsel for all of the parties personally met and conferred at the office of Bank of America's
 26 counsel on March 28, 2017. At this meeting, which lasted nearly two hours, the parties' counsel
 27 discussed the various issues relating to the proposed joint pre-trial order and reached agreement that
 28 a one-month continuance is in the best interest of the parties and the court. **First**, there are ongoing

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settlement negotiations between Jessup and Ms. Wong-Culotta and their counsel believe a settlement is possible in the near future. **Second**, Jessup has requested that Bank of America release its claims against it in exchange for Jessup's disclaimer of interest. Bank of America is currently evaluating that request. **Third**, Ms. Wong-Culotta had not yet filed her Rule 26 initial disclosures as of the date of the parties' meeting. She has also requested a jury trial for the issues that pertain to her.

For these reasons, the parties believe a continuance would further the efficient administration of this case. The issues to be presented at trial would be greatly simplified if (a) Jessup and Ms. Wong-Culotta reach settlement, and/or (b) Bank of America reaches agreement with Jessup. In addition, the parties' counsel need to address Ms. Wong-Culotta's initial disclosures.

The parties accordingly stipulate to extend the deadline for the submission of the proposed joint pre-trial order to June 2, 2017. This request is made to allow the ongoing settlement talks among Ms. Wong-Culotta, Jessup, and Bank of America to proceed, as the issues to be presented at trial would be narrowed if agreements are reached. This request is not made for purpose of delay.

Dated this 31st day of March, 2016.

<p>AKERMAN LLP</p> <hr/> <p>/s/ Ariel Stern</p> <p>ARIEL STERN, ESQ. Nevada Bar No. 8276</p> <p>BRETT M. COOMBS, ESQ. Nevada Bar No. 12570 1160 Town Center Drive, Suite 330 Las Vegas, Nevada 89144 Telephone: (702) 634-5000</p> <p>Attorneys for Bank of America, N.A.</p>	<p>KIM GILBERT EBRON</p> <hr/> <p>/s/ Diana Cline Ebron</p> <p>DIANA CLINE EBRON, ESQ. Nevada Bar No. 10580</p> <p>JACQUELINE A. GILBERT, ESQ. Nevada Bar No. 10593</p> <p>KAREN L. HANKS, ESQ. Nevada Bar No. 009578 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139 Telephone: (702) 485-3300</p> <p>Attorneys for SFR Investments Pool 1, LLC</p>

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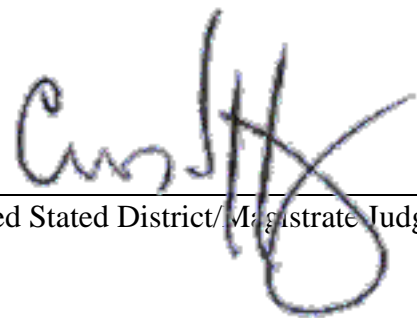
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Attorneys for Daunshari Wong-Culotta

IT IS SO ORDERED.

Dated this ___ April 3 _____, 2017.



United States District/Magistrate Judge