

1 ARIEL E. STERN, ESQ.
 Nevada Bar No. 8276
 2 VATANA LAY, ESQ.
 Nevada Bar No. 12570
 3 JESSE A. RANSOM, ESQ.
 Nevada Bar No. 13565
 4 AKERMAN LLP
 1160 Town Center Drive, Suite 330
 5 Las Vegas, NV 89144
 Telephone: (702) 634-5000
 6 Facsimile: (702) 380-8572
 Email: ariel.stern@akerman.com
 7 vatana.lay@akerman.com
 jesse.ransom@akerman.com
 8

9 Attorneys for Plaintiff and Counter-Defendant
 Bank of America, N.A.

10
 11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

AKERMAN LLP

1160 TOWN CENTER DRIVE, SUITE 330
 LAS VEGAS, NEVADA 89144
 TEL.: (702) 634-5000 – FAX: (702) 380-8572

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

15 Plaintiff,

16 vs.

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

20 Defendants.

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

**JOINT MOTION TO CONTINUE
 DEADLINE FOR FILING PROPOSED
 PRE-TRIAL ORDER**

21 and all related claims.
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23 Bank of America, N.A., SFR Investments Pool 1, LLC, Davyn Ridge Homeowners
 24 Association, Thomas Jessup, LLC, and Daunshari Wong-Culotta hereby jointly move for a
 25 continuance of the deadline to file the joint pre-trial order. This is the third request for a continuance
 26 of this deadline.

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I. PROCEDURAL HISTORY

This case is one of several hundred in Nevada arising from the purchase of a property at a homeowners' association's non-judicial foreclosure sale. The parties in this matter filed dispositive motions on their various claims. The Court on February 14, 2017, denied all pending dispositive motions and ordered that a pre-trial order be filed on or before March 16, 2017 [88].

Two days before the proposed pre-trial order was due Third Third-party defendant Dunshari Wong Culotta filed a motion to alter or amend order ECF No. 88 pursuant to Rule 59(e). On March 16, 2017 the parties filed a joint motion continue the deadline to file the pre-trial order so that the Court could decide the motion to alter or amend [91]; the Court granted that motion the following day and set the deadline to March 31, 2017 [92].

Counsel for all of the parties personally met and conferred at the office of Bank of America's counsel on March 28, 2017. At this meeting, which lasted nearly two hours, the parties' counsel discussed the various issues relating to the proposed joint pre-trial order and reached agreement that a continuance was in the best interest of the parties and the court. Additionally, the several of the parties began settlement discussions, which if successful, would narrow the issues at trial. Thus, on March 31, 2017, the parties filed the second request to continue the deadline for filing the proposed pre-trial order [96]; the Court granted that request and set the new deadline to June 2, 2017 [97].

II. GOOD CAUSE EXISTS TO CONTINUE THE DEADLINE

Since March 31, 2017, the parties engaged in settlement have made significant progress to resolve the claims between them, however, the parties believe that additional time to complete the proposed pre-trial order is still warranted.

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First, there continue to be ongoing settlement negotiations between Jessup and Ms. Wong-Culotta and their counsel have reached a an agreement in principle on the material terms. During this time Ms. Wong-Cullota and Jessup have been attempting to reach a global settlement involving this and other disputes outside this litigation. The complex nature of the various disputes required additional time. **Second**, Jessup has requested that Bank of America release its claims against it in exchange for Jessup's disclaimer of interest. Now that Ms. Wong-Cullota and Jessup have reached an agreement in principle, Bank of America needs additional time to discuss the terms of settlement with Jessup and the potential impact on the trial.

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. The parties will have additional time to fully and carefully prepare the pre-trial order to address the remaining issues in this case, which will allow the court to more efficiently try this matter. The parties have made a good-faith effort to resolve the various claims, and no party will be prejudice by the requested extension. This request is not made for purpose of delay or to prejudice any party.

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1 The parties accordingly move to extend the deadline for the submission of the proposed joint
 2 pre-trial order to June 30, 2017.

3 Dated this 2nd day of June, 2017.

4 **AKERMAN LLP**

5 /s/ Jesse A. Ransom, Esq.
 6 **ARIEL STERN, ESQ.**
 Nevada Bar No. 8276
 7 **VATANA LAY, ESQ.**
 Nevada Bar No. 12993
 8 **JESSE A. RANSOM, ESQ.**
 Nevada Bar No. 13565
 9 1160 Town Center Drive, Suite 330
 Las Vegas, Nevada 89144
 10 Telephone: (702) 634-5000

11 Attorneys for Bank of America, N.A.

MARQUIS AURBACH COFFING

/s/ Patrick McDonnell, Esq.
PATRICK MCDONNELL, ESQ.
 Nevada Bar No. 13188
 10001 Park Run Drive
 Las Vegas, Nevada 89145
 Telephone: (702) 382-0711
 Attorneys for Daunshari Wong-Culotta

12 **LEACH JOHNSON SONG & GRUCHOW**

13 /s/ Ryan D. Hastings, Esq.
 14 **SEAN L. ANDERSON, ESQ.**
 Nevada Bar No. 7529
 15 **RYAN D. HASTINGS, ESQ.**
 Nevada Bar No. 12394
 16 8945 W. Russell Road, Suite 330
 Las Vegas, Nevada 89148
 17 Telephone: (702) 538-9074

18 Attorneys for Davyn Ridge Homeowners'
 19 Association

MORTENSON & RAFIE

/s/ Peter Mortenson, Esq.
PETER MORTENSON, ESQ.
 Nevada Bar No. 5725
 10781 West Twain Avenue
 Las Vegas, Nevada 89135
 Telephone: (702) 363-4190

Attorneys for Thomas Jessup, LLC

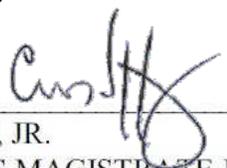
20 **KIM GILBERT EBRON**

21 /s/ Karen L. Hanks, Esq.
 22 **DIANA CLINE EBRON, ESQ.**
 Nevada Bar No. 10580
 23 **JACQUELINE A. GILBERT, ESQ.**
 Nevada Bar No. 10593
 24 **KAREN L. HANKS, ESQ.**
 Nevada Bar No. 009578
 25 7625 Dean Martin Drive, Suite 110
 Las Vegas, Nevada 89139
 26 Telephone: (702) 485-3300

27 Attorneys for SFR Investments Pool 1, LLC

IT IS SO ORDERED.

DATED: June 5, 2017


 C.W. HOFFMAN, JR.
 UNITED STATES MAGISTRATE JUDGE