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10	Attorneys for Bank of America, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,			
Plaintiff,			
VS.			
COTTONWOOD AT SUNRISE MOUNTAIN HOMEOWNERS ASSOCIATION; EDWARD KIELTY TRUST; AND NEVADA ASSOCIATION SERVICES, INC.,			
Defendants.			
EDWARD KIELTY TRUST, a Nevada Trust			
Counterclaimant,			
VS.			
BANK OF AMERICA, N.A., a national bank; DOE INDIVIDUALS I-X; and ROE CORPORATIONS I-X, inclusive			

Counterdefendants,

Case No.: 2:16-cv-00310-RFB-CWH

STIPULATION TO TAKE DEPOSITION OF BO JONES OUTSIDE OF THE DISCOVERY DEADLINES

(First Request)

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AKERMAN LLP

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Bank of America, N.A., Cottonwood at Sunrise Mountain Homeowners Association, Edward Kielty Trust, and Nevada Association Services, Inc. respectfully submit the following stipulation requesting to take Bo Jones' deposition outside of the discovery deadline. This is the parties' first request to take a deposition outside of the discovery deadline.

Discovery in this case closes on September 6, 2016. ECF No. 21, ¶ 1. The parties have participated in discovery in good faith. After BANA timely took each of defendants' depositions, BANA learned Bo Jones purchased the property on Kielty Trust's behalf. On August 15, 2016, BANA served a subpoena to Bo Jones, c/o Luis A. Ayon, noticing Bo Jones' deposition for September 1, 2016 at 1:00 p.m. On the day of the noticed deposition, BANA learned Bo Jones was on vacation and would not be appearing for her September 1 deposition. The parties have agreed to take Bo Jones' deposition outside the discovery period. BANA intends to re-notice Bo Jones' deposition for September 9, 2016 at 1:00 p.m. The parties' agreement to reschedule Bo Jones' deposition will not affect any other deadlines in this case.

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1	The parties request the court allow BANA to take Bo Jones' deposition on September 9,		
2	2016. In the event a subsequent conflict arises with the September 9, 2016 deposition, the parties		
3	request the court allow BANA to take Bo Jones' deposition up to and including September 15, 2016.		
4			
5	Dated this 1st day of September, 2016.	Dated this 1st day of September, 2016.	
6	AKERMAN LLP	TYSON & MENDES, LLP	
AKERMAN LLP 1160 Town Center Drive, Suite 330 LAS VEGAS, NEVADA 89144 TEL.: (702) 634-5000 – FAX: (702) 380-8572 19 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	/s/ William S. Habdas ARIEL E. STERN, ESQ. Nevada Bar No. 8276 MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 REBEKKAH B. BODOFF, ESQ. Nevada Bar No. 12703 WILLIAM HABDAS Nevada Bar No. 13138 1160 Town Center Drive, Suite 330 Las Vegas, Nevada 89144 Attorneys for Bank of America, N.A. Dated this 1st day of September, 2016. MAIER GUTIERREZ AYON		
17	/s/ Margaret E. Schmidt LUIS AYON, ESQ.	/s/ Richard E. Vilkin	
18	Nevada Bar No. 9752 MARGARET E. SCHMIDT, ESQ.	RICHARD E. VILKIN, ESQ. Nevada Bar No. 8301	
19	Nevada Bar No. 12489 400 South Seventh Street, Suite 400	1286 Crimson Sage Ave. Henderson, Nevada 89012	
20	Las Vegas, Nevada 89101	Attorney for Nevada Association Services, Inc.	
21	Attorneys for Edward Kielty Trust	·	
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23		IT IS SO ORDERED:	
24		W J J X	
25		UNITED STATES MAGISTRATE JUDGE September 6, 2116	
26		DATED:	

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