

1 DARREN T. BRENNER, ESQ.
 Nevada Bar No. 8386
 2 JAMIE K. COMBS, ESQ.
 Nevada Bar No. 13088
 3 AKERMAN LLP
 1635 Village Center Circle, Suite 200
 4 Las Vegas, Nevada 89134
 Telephone: (702) 634-5000
 5 Facsimile: (702) 380-8572
 Email: darren.brenner@akerman.com
 6 Email: jamie.combs@akerman.com

7 *Attorneys for plaintiff and counter-defendant*
Bank of America, N.A., successor by merger
 8 *to BAC Home Loans Servicing LP f/k/a*
Countrywide Home Loans Servicing LP
 9

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

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200
 LAS VEGAS, NEVADA 89134
 TEL.: (702) 634-5000 – FAX: (702) 380-8572

12 BANK OF AMERICA, N.A., SUCCESSOR BY
 13 MERGER TO BAC HOME LOANS
 14 SERVICING, LP FKA COUNTRYWIDE
 HOME LOANS SERVICING, LP,

15 Plaintiff,

16 v.

17 LAKE MEAD COURT HOMEOWNERS'
 18 ASSOCIATION, SFR INVESTMENTS POOL
 1, LLC, AND ALESSI & KOENIG, LLC,

19 Defendants.

20 SFR INVESTMENTS POOL 1, LLC, a Nevada
 21 limited liability company,

22 Counter/Cross Claimant,

23 vs.

24 BANK OF AMERICA, N.A., SUCCESSOR BY
 25 MERGER TO BAC HOME LOANS
 SERVICING , LP FKA COUNTRYWIDE
 HOME LOANS SERVICING, LP, and CARLOS
 NEVAREZ, an individual,

26 Counter/Cross-Defendants
 27

Case No.: 2:16-cv-00504-GMN-NJK

**STIPULATION AND ORDER TO
 EXTEND DISPOSITIVE MOTIONS
 DEADLINE PENDING RULING ON
 MOTION FOR PROTECTIVE ORDER**

[FIRST REQUEST]

1 Plaintiff and counter-defendant Bank of America, N.A., successor by merger to BAC Home
2 Loans Servicing, LP f/k/a Countrywide Home Loans Servicing LP (**BANA**); defendant Lake Mead
3 Court Homeowners Association; and defendant and cross-claimant SFR Investments Pool 1, LLC
4 stipulate to extend the dispositive motions deadline until seventy five (75) days after the Court enters
5 an order on BANA's motion for protective order, ECF No. 70, as follows:

6 1. BANA filed its complaint on March 8, 2016 asserting a quiet title/declaratory
7 judgment claim against all defendants, breach of NRS 116.1113 and wrongful foreclosure claims
8 against Lake Mead and Alessi, and an injunction claim against SFR. (ECF No. 1.)

9 2. The Court entered an initial discovery plan and scheduling order on May 9, 2016,
10 setting a November 25, 2016 dispositive motions deadline. (ECF No. 25.)

11 3. The Court administratively stayed this case pending exhaustion of all appeals in
12 *Bourne Valley Court Trust v Wells Fargo Bank, N.A.*, Ninth Cir. Case No. 15-15233 on September
13 20, 2016. (ECF No. 56.) The case remained stayed until November 3, 2017. (ECF No. 63.)

14 4. The parties subsequently filed an amended discovery plan and scheduling order on
15 December 5, 2017, setting a February 5, 2018 discovery cut-off and a March 7, 2018 dispositive
16 motions deadline. (ECF No. 66.) The Court approved the amended discovery plan. (ECF No. 68.)

17 5. SFR noticed BANA's Rule 30(b)(6) deposition on January 2, 2018. (ECF No. 70-1,
18 at 12.) BANA initially disputed seven of the thirteen noticed topics. The parties resolved their
19 dispute regarding four topics during their meet and confer. BANA moved for a protective order
20 regarding the remaining three on January 24, 2018, ECF No. 70, and SFR agreed to hold BANA's
21 deposition in abeyance pending a ruling. The parties completed the briefing on BANA's motion on
22 February 21, 2018, ECF No. 75, and do not anticipate a ruling before the current March 8, 2018
23 dispositive motions deadline.

24 6. To allow time for the Court to rule on BANA's motion for protective order, ECF No.
25 70, to allow time to complete BANA's deposition after the Court makes its ruling, and to avoid
26 additional Rule 56(d) motions, the parties stipulate to extending the dispositive motions deadline
27 until seventy five (75) days from the date the Court enters an order on BANA's motion for protective
28 order, ECF No. 70. The parties further stipulate SFR shall have forty five (45) days to complete

1 BANA's deposition after the Court enters an order. The parties select these deadlines to allow
2 sufficient time to coordinate a deposition and obtain transcripts before filing dispositive motions.

3 7. The parties do not file this stipulation with the intent to delay, but instead to
4 streamline the anticipated summary judgment briefing and avoid additional Rule 56(d) motions.

5 This the 2nd day of March, 2018.

This the 2nd day of March, 2018.

6 **AKERMAN LLP**

KIM GILBERT EBRO

7 /s/ Jamie K. Combs
8 ARIEL E. STERN, ESQ.
9 Nevada Bar No. 8276
10 JAMIE K. COMBS, ESQ.
11 Nevada Bar No. 13088
12 1160 Town Center Drive, Suite
13 Las Vegas, Nevada 89144

/s/ Diana S. Ebron
DIANA S. EBRO, ESQ.
Nevada Bar No. 10580
JACQUELINE A. GILBERT, ESQ.
Nevada Bar No. 10593
KAREN L. HANKS, ESQ.
Nevada Bar No. 9578
7625 Dean Martin Drive, Suite 110
Las Vegas, Nevada 89139

*Attorneys for plaintiff and counter-defendant
Bank of America, N.A., successor by merger to
BAC Home Loans Servicing LP f/k/a
Countrywide Home Loans Servicing LP*

*Attorneys for defendant, counterclaimant and
cross-claimant SFR Investments Pool 1, LLC*

14 This the 2nd day of March, 2018.

15 **HALL JAFFE & CLAYTON, LLP**

16 /s/ Ashlie L. Surur
17 ASHLIE L. SURUR, ESQ.
18 Nevada Bar No. 11290
19 7425 Peak Drive
20 Las Vegas, NV 89128

*Attorneys for Lake Mead Court Homeowners'
Association*

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: March 8, 2018