

1 MELANIE D. MORGAN, ESQ.  
 Nevada Bar No. 8215  
 2 JAMIE K. COMBS, ESQ.  
 Nevada Bar No. 13088  
 3 AKERMAN LLP  
 1635 Village Center Circle, Suite 200  
 4 Las Vegas, NV 89134  
 Telephone: (702) 634-5000  
 5 Facsimile: (702) 380-8572  
 Email: melanie.morgan@akerman.com  
 6 Email: jamie.combs@akerman.com

7 Attorneys for plaintiff Bank of America, N.A.,  
 successor by merger to BAC Home Loans  
 8 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  
 MERGER TO BAC HOME LOANS  
 13 SERVICING, LP FKA COUNTRYWIDE  
 HOME LOANS SERVICING, LP,  
 14

Plaintiff,

15 v.

16 INSPIRADA COMMUNITY ASSOCIATION;  
 17 AIRMOTIVE INVESTMENTS, LLC; and  
 LEACH JOHNSON SONG & GRUCHOW,  
 18

Defendants.

Case No.: 2:16-cv-01932-APG-EJY

**STIPULATION AND ORDER TO EXTEND  
 DEADLINE TO OPPOSE DEFENDANT  
 AIRMOTIVE INVESTMENTS, LLC'S  
 MOTION FOR SUMMARY JUDGMENT  
 [ECF NO. 34]**

**FIRST REQUEST**

19 INSPIRADA COMMUNITY ASSOCIATION,  
 20

Counterclaimant,

21 v.

22 LEACH JOHNSON SONG & GRUCHOW,  
 23

Counter-defendant.

26  
 27 Plaintiff Bank of America, N.A., successor by merger to BAC Home Loans Servicing, LP fka  
 28 Countrywide Home Loans Servicing, LP (**BANA**) and defendant Airmotive Investments, LLC

1 respectfully submit the following stipulation to allow BANA an additional sixty days to oppose  
2 Airmotive's motion for summary judgment, ECF No. 34.

3 Airmotive moved for summary judgment on February 14, 2020. (ECF No. 34.) BANA's  
4 opposition is due March 6, 2020. BANA and Airmotive stipulate to extending BANA's opposition  
5 deadline by sixty days, to **May 5, 2020**, to allow BANA time to complete discovery before responding  
6 to Airmotive's motion. The discovery cut-off is not until May 18, 2020. (ECF No. 30.)

7 This is the first request to extend BANA's opposition deadline. This stipulation is not made to  
8 cause delay or prejudice to any party.

9 DATED: February 25, 2020.

10  
11 **AKERMAN LLP**

**ROGER P. CROTEAU & ASSOCIATES, LTD.**

12 /s/ Jamie K. Combs, Esq.  
13 MELANIE D. MORGAN, ESQ.  
14 Nevada Bar No. 8215  
15 JAMIE K. COMBS, ESQ.  
16 Nevada Bar No. 13088  
17 1635 Village Center Circle, Suite 200  
18 Las Vegas, Nevada 89134


/s/ Tim R. Rhoda  
ROGER P. CROTEAU, ESQ.  
Nevada Bar No. 4958  
TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
9120 West Post Road, Suite 100  
Las Vegas, Nevada 89148

17 Attorneys for plaintiff Bank of America, N.A.,  
18 successor by merger to BAC Home Loans  
19 Servicnig, LP f/k/a Countrywide Home Loans  
20 Servicing, LP

Attorneys for defendant Airmotive Investments,  
LLC

21 **ORDER**

22 IT IS SO ORDERED:

23  
24   
25 UNITED STATES DISTRICT JUDGE  
26 Dated: February 26, 2020.