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10 Attorneys for Defendant  
 11 BANK OF AMERICA, N.A.

12 *(Additional counsel appear on following page)*

13 **UNITED STATES DISTRICT COURT**  
 14 **DISTRICT OF NEVADA**

16 MAUREEN CLARK and SONYA  
 17 ALEXANDER, individually, and on  
 behalf of all others similarly situated,

18 Plaintiff,

19 vs.

20 BANK OF AMERICA N.A.

21 Defendant.  
 22

CASE NO. 2:16-cv-02228-GMN-VCF

**JOINT STIPULATION TO  
 CONTINUE DEADLINE TO FILE  
 PROPOSED PLAN**

Complaint Filed: September 21, 2016

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17 *Attorneys for Plaintiffs* MAUREEN CLARK and  
SONYA ALEXANDER  
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1 RECITALS

2 WHEREAS, on November 15, 2019, this Court issued an Order setting a  
3 discovery hearing for this case for November 25, 2019 [Dkt. #88];  
4

5 WHEREAS, on November 19, 2019, Plaintiffs and Defendant (collectively,  
6 the “Parties”) filed a joint motion to continue the discovery hearing originally set for  
7 November 25, 2019 (“Joint Motion”) in light of the Parties’ upcoming mediation on  
8 November 20, 2019 [Dtk. #89];  
9

10 WHEREAS, on November 20, 2019, this Court issued an order granting the  
11 Parties Joint Motion dated November 19, 2019, vacating the discovery hearing  
12 originally set for November 25, 2019, and requiring the Parties to submit a proposed  
13 plan and scheduling order (“Proposed Plan”) on or before December 4, 2019 in the  
14 event that this case did not settle at the mediation on November 20, 2019 [Dtk. #90];  
15

16 WHEREAS, on November 20, 2019, the Parties attended and participated in  
17 the scheduled mediation, at the conclusion of which a mediator’s proposal was  
18 made, which the Parties have until January 20, 2020, to accept or reject;  
19

20 WHEREAS, on Tuesday, November 26, 2019, shortly before the  
21 Thanksgiving Holiday, Plaintiff’s Counsel provided Defendant’s Counsel with an  
22 initial draft of the Proposed Plan;  
23

24 WHEREAS, on November 27, 2019, the Parties filed a joint report regarding  
25 the status of the November 20, 2019 mediation, and stating that the Parties were  
26 conferring regarding a draft of the Proposed Plan to be filed by December 4, 2019  
27 [Dtk. #92];  
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WHEREAS, immediately after the Thanksgiving holiday weekend, Defendant's lead counsel became engaged in jury duty, which is expected to last for at least another five-to-seven days, and, consequently, the Parties need additional time to meet and confer to attempt to narrow or eliminate their areas of disagreement about certain aspects of the Proposed Plan before finalizing and filing it, which the Parties are confident will be accomplished by December 13, 2019;

WHEREAS, in light of the pending mediator's proposal and the contingent possibility of settlement on or by January 20, 2020, the Scheduling Order to be entered by the Court may become moot issue; and

WHEREAS, in light of all of the foregoing, the Parties have conferred and agree that good cause exists to continue the deadline for filing the Proposed Plan from December 4, 2019 to December 13, 2019.

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**STIPULATION**

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, through their respective undersigned counsel, and for good cause, that upon entry of an Order by the Court approving this Stipulation:

- (1) The Parties’ deadline for filing a joint discovery plan and scheduling order is continued from December 4, 2019 to December 13, 2019.
- (2) By entering into this Stipulation, the Parties do not waive and expressly reserve all claims, defenses and challenges in this.

IT IS SO STIPULATED AND AGREED.

DATED: December 4, 2019

**MCGUIREWOODS LLP**

By:           /s/ Michael Mandel            
Michael Mandel, Esq.

Attorneys for Defendant  
BANK OF AMERICA, N.A.

DATED: December 4, 2019

**WOLF, RIFKIN, SHAPIRO, SCHULMAN  
& RABKIN, LLP**

By:           /s/ Don Springmeyer            
Don Springmeyer, Esq.

Attorneys for Plaintiffs  
MAUREEN CLARK and SONYA  
ALEXANDER

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CASE NO. 2:16-cv-02228-GMN-VCF

**ORDER GRANTING JOINT  
STIPULATION TO CONTINUE  
DEADLINE TO FILE PROPOSED  
DISCOVERY PLAN AND  
SCHEDULING ORDER**

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