

**SMITH LARSEN & WIXOM**

ATTORNEYS  
HILLS CENTER BUSINESS PARK  
1935 VILLAGE CENTER CIRCLE  
LAS VEGAS, NEVADA 89134  
(702) 252-5002 • (702) 252-5006

1 Kent F. Larsen, Esq.  
Nevada Bar No. 3463  
2 SMITH LARSEN & WIXOM  
3 1935 Village Center Circle  
Las Vegas, Nevada 89134  
4 Tel.: (702) 252-5002  
5 Fax: (702) 252-5006  
6 Email: kfl@slwlaw.com  
Attorneys for Defendant/Counterclaimant  
JPMorgan Chase Bank, N.A.

7  
8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 SHIREHAMPTON DRIVE TRUST,

11 Plaintiff,

12 v.

13 JPMORGAN CHASE BANK, NATIONAL  
14 ASSOCIATION; MTC FINANCIAL INC.  
15 DBA TRUSTEE CORPS; and LOUISA  
16 OAKENELL,

17 Defendants.

CASE NO.: 2:16-cv-02276-RFB-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINES TO FILE  
SUPPLEMENTAL BRIEFS  
RE: NOVEMBER 19, 2021 STATUS  
HEARING**

**(First Request)**

18 JPMORGAN CHASE BANK, N.A.,

19 Counterclaimant,

20 v.

21 SHIREHAMPTON DRIVE TRUST; DOES  
22 1 through 10, inclusive; and ROE  
23 CORPORATIONS 1 through 10, inclusive,

24 Counterdefendants.  
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26  
27 Plaintiff Shirehampton Drive Trust (“Plaintiff”) and Defendants JPMorgan Chase Bank,  
28 N.A. (“Chase”), by and through their respective counsel of record, hereby agree as follows:

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1           1.       On November 19, 2022, the Court held a status hearing regarding this matter in  
2 light the Memorandum entered by the Ninth Circuit Court of Appeals in Case No. 19-17253 on  
3 October 18, 2020 (Docket No. 70).

4           2.       After discussion at the status hearing, the Court directed Plaintiff and Chase to  
5 submit supplemental briefs to address certain issues raised by the Ninth Circuit’s Memorandum.  
6

7           3.       Plaintiff’s counsel submitted his brief on December 20, 2021(Docket No. 78),  
8 but the undersigned counsel for Chase inadvertently (and, apparently, incorrectly) believed that  
9 the briefing would be sequential (with Chase’s response brief to be filed on January 10, 2022,  
10 and Plaintiff’s reply (if any) to be filed on January 24, 2022).

11           4.       The undersigned Counsel have discussed this situation, and respectfully ask this  
12 Court to extend/modify the briefing deadlines and protocol arising from the November 19, 2021  
13 status hearing as follows:  
14

- 15           (i)       Chase’s initial brief (and its opposition to Plaintiff’s December 20, 2021 brief  
16               (Docket No. 78)) shall be due on Monday, January 10, 2022;
- 17           (ii)       Plaintiff’s opposition to Chase’s initial brief (and its reply, if any, relative to  
18               Plaintiff’s December 20, 2021 brief) shall be due on Monday, January 31, 2022;  
19           and,  
20           (iii)       any reply of Chase (if any) shall be due no later than Monday, February 14,  
21               2022.  
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5. The parties respectfully submit that the instant stipulation (and the extension set forth herein) is not requested for purposes of delay, but is submitted in good faith to address an inadvertent error in this matter and to allow the parties to orderly brief the issues before the Court.

Dated this 3<sup>rd</sup> day of January, 2022.

Dated this 3<sup>rd</sup> day of January, 2022.

SMITH LARSEN & WIXOM

LAW OFFICES OF MICHAEL F. BOHN,  
ESQ., LTD.

/s/ Kent F. Larsen

/s/ Michael F. Bohn

Kent F. Larsen, Esq.  
Nevada Bar No. 3463  
1935 Village Center Circle  
Las Vegas, Nevada 89134  
Attorneys for Defendant/Counterclaimant  
JPMorgan Chase Bank, N.A.

Michael F. Bohn, Esq.  
Nevada Bar No. 1641  
2260 Corporate Cir., Suite 480  
Henderson, Nevada 89074  
Attorney for Plaintiff/Counterdefendant  
Shirehampton Drive Trust

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE

JUDGE DATED: January 3, 2022.