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 6

7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**  
 9

10 WELLS FARGO BANK, N.A., a national  
 banking association,  
 11 Plaintiff,  
 12 vs.

Case No.: 2:16-cv-02363-JCM-GWF

13 LV REAL ESTATE STRATEGIC  
 INVESTMENT GROUP LLC SERIES 2679, a  
 14 Nevada limited-liability company; REDROCK  
 PARK HOMEOWNER’S ASSOCIATION, a  
 15 Nevada non-profit corporation; ATC  
 ASSESSMENT COLLECTION GROUP,  
 16 LLC, a Nevada limited-liability company;  
 17 Defendants.  
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**STIPULATION AND ORDER TO  
 EXTEND DEADLINE TO FILE  
 OPPOSITIONS TO PENDING  
 MOTION FOR SUMMARY  
 JUDGMENT  
 (Second Request)**

19 Defendant LV Real Estate Strategic Investment Group, LLC Series 2679 (hereinafter  
 20 **“LV Real Estate”**), Defendant Redrock Park Homeowner’s Association (the **“HOA”**), and  
 21 Plaintiff Wells Fargo Bank, N.A. (**“hereinafter Wells Fargo”**) (collectively, the **“Parties”**), by  
 22 and through their respective counsels of record, hereby submit the following second request  
 23 for a Stipulation and Order to extend the deadline for filing oppositions and commensurately  
 24 extending deadlines for filing replies in support of pending dispositive motions.  
 25  
 26

27 THE LAW OFFICES OF  
 BRAUER DRISCOLL SUN  
 AND ASSOC LLC  
 3333 E. Serene Ave. Ste 150  
 Henderson, 89074  
 (702) 989-3213  
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1           WHEREAS, on December 13, 2017, this Court entered an order (ECF No. 32) setting a  
2 briefing schedule for a dispositive motion based on the federal foreclosure bar.

3           WHEREAS on December 27, 2017, Wells Fargo filed its Motion for Summary  
4 Judgment. ECF No. 33.

5           WHEREAS on January 25, 2018, the Parties filed a first Stipulation for an extension of  
6 time (ECF No. 43) that the Court approved on January 31, 2018 (ECF No. 44) permitting  
7 responses by February 7, 2018.

8           WHEREAS, the Parties are in potentially final stages of a settlement negotiation, which  
9 started in mid-January and which continues to day this Second Request is filed, with terms of  
10 settlement continuing to narrow significantly such that the parties believe a settlement is both  
11 possible and now likely.

12           THEREFORE, the Parties stipulate and agree to extend the deadlines for opposition to  
13 Wells Fargo's Motion for Summary Judgment by 30 days to permit the parties time to attempt  
14 to complete such settlement negotiations.

15           WHEREFORE, based on the foregoing,  
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21           IT IS HEREBY STIPULATED AND AGREED that the deadline for oppositions to  
22 Wells Fargo's Motions for Summary Judgment should be extended to March 7, 2018. And the  
23 deadline for Wells Fargo to file any reply is 21 days from the date of any opposition, or March  
24 28, 2018. The Parties stipulate and agree to the foregoing in good faith. This Stipulation is  
25 made for the benefit and convenience of the Parties and is not intended to delay the proceedings  
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1 in this case. This is the Parties' second request to extend the briefing schedule that was  
2 originally established by the Court's December 13, 2017 order.

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4 IT IS SO STIPULATED.

5  
6 DATED: February 6, 2018.

|    |                                                |                                                  |
|----|------------------------------------------------|--------------------------------------------------|
| 7  | SNELL & WILMER L.L.P.                          | BRAUER, DRISCOLL, SUN AND ASSOCIATES, LLC        |
| 8  | <u>/s/ Wayne Klomp</u>                         | <u>/s/ Jeff Brauer</u>                           |
| 9  | Wayne Klomp, Esq.                              | Jeff Brauer, Esq.                                |
| 10 | Nevada Bar No. 10109                           | Nevada Bar No. 13834                             |
| 11 | John S. Delikanakis, Esq.                      | Henderson, Nevada 89074                          |
|    | Nevada Bar No. 5928                            | Attorneys for Defendant LV Real Estate Strategic |
|    | Reno, Nevada 89501-1961                        | Investment Group LLC                             |
|    | Attorneys for Plaintiff Wells Fargo Bank, N.A. |                                                  |

12 TYSON & MENDES LLP

13 /s/ Christopher Lund

14 Thomas E. McGrath, Esq.

15 Nevada Bar No. 7086

16 Christopher Ammond Lund

17 Nevada Bar No. 12435

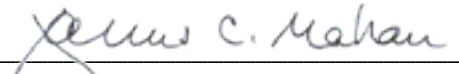
Las Vegas, Nevada 89123

Attorneys for Defendant Redrock Park

*Homeowner's Association*

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20 **Case No.:** 2:16-cv-02363-JCM-GWF

21 **IT IS SO ORDERED:**

22   
23 UNITED STATES DISTRICT JUDGE,

24 DATED: February 8, 2018



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**CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2018, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Jeff Brauer

Jeff Brauer, Esq. an employee of BRAUER, DRISCOLL, SUN AND ASSOCIATES LLC