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 8 *for the Certificateholders of Structured Asset*
 9 *Mortgage Investments II, Inc., Bear Stearns*
 10 *ALT-A Trust, Mortgage Pass-Through*
 11 *Certificates Series 2006-6 and Mortgage*
 12 *Electronic Registration Systems, Inc.*

11 UNITED STATES DISTRICT COURT
 12 DISTRICT OF NEVADA

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13 CITIBANK, N.A. AS TRUSTEE FOR THE
 14 CERTIFICATEHOLDERS OF
 15 STRUCTURED ASSET MORTGAGE
 16 INVESTMENTS II, INC., BEAR
 STEARNS ALT-A TRUST, MORTGAGE
 PASS-THROUGH CERTIFICATES
 SERIES 2006-6

17 Plaintiff,

18 vs.

19 SFR INVESTMENTS POOL 1, LLC, a
 20 Nevada non-profit corporation; SEVILLE
 21 ETAGE HOMEOWNERS ASSOCIATION,
 a Nevada non-profit corporation,

22 Defendants.

23 SFR INVESTMENTS POOL 1, LLC, a
 24 Nevada limited liability company,

25 Counter/Cross Claimant

26 vs.

27 CITIBANK, N.A. AS TRUSTEE FOR THE
 28 CERTIFICATEHOLDERS OF
 STRUCTURED ASSET MORTGAGE
 INVESTMENTS II, INC., BEAR

Case No. 2:16-cv-02766-JCM-VCF

**STIPULATION AND ORDER TO
 AMEND SCHEDULING ORDER
 TO EXTEND DISPOSITIVE
 MOTIONS DEADLINE AND
 DEADLINE FOR PRETRIAL
 ORDER
 [THIRD REQUEST]**

1 STEARNS ALT-A TRUST, MORTGAGE
2 PASS-THROUGH CERTIFICATES
3 SERIES 2006-6; MORTGAGE
4 ELECTRONIC REGISTRATION
5 SYSTEMS, INC., AS NOMINEE FOR
6 REPUBLIC MORTGAGE, LLC DBA
7 REPUBLIC MORTGAGE; FRANKIE M.
8 ABENOJAR, an individual; JANE P.
9 ABENOJAR, an individual,

Counter/Cross Defendants/

Pursuant to Fed. R. Civ. P. 26(a)(2) and 6(b)(a)(1)(A) and LR 26-4, Plaintiff, Citibank, N.A. as Trustee for the Certificateholders of Structured Asset Mortgage Investments II, Inc., Bear Stearns ALT-A Trust, Mortgage Pass-Through Certificates Series 2006-6 and Mortgage Electronic Registration Systems, Inc. (“Trustee”), Defendant SFR Investment Pools 1, LLC (“SFR”), and Defendant Seville Etage Homeowners Association (the “Association”) (together, the “Parties”) hereby submit the following Stipulation and Order to Extend Dispositive Motions Deadline and Deadline for Pretrial Order (Third Request).

Under the Discovery Plan and Scheduling Order [ECF No. 33], as amended by the Stipulation and Order to Extend Discovery Deadlines [ECF No. 44.] the current deadlines are as follows:

Dispositive Motions	Wednesday April 4, 2018
Joint Pre-Trial Order	Friday, May 4, 2018

Pursuant to LR 26-4, a stipulation to extend any dates set by the scheduling order must be supported by a showing of good cause for the extension. “The good cause inquiry focuses primarily on the movant's diligence.” *Novotny v. Outback Steakhouse of Fla., LLC*, 2017 U.S. Dist. LEXIS 114672 at *2 (D. Nev. July 21, 2017) (citing *Coleman v. Quaker Oats Co.*, 232 F.3d 1271, 1294-95 (9th Cir. 2000)). “Good cause to extend a discovery deadline exists ‘if it cannot reasonably be met despite the diligence of the party seeking the extension.’” *Id.* (quoting *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)). Good cause exists

1 in this case. All of the Parties have exercised diligence with regards to completing
2 discovery, and discovery is now completed. The Parties believe that an additional
3 two week extension of the dispositive motions and joint pre-trial orders deadline is
4 appropriate to accommodate unanticipated scheduling conflicts on the part of
5 counsel. The Parties have not previously requested an extension of the dispositive
6 motions deadline, however, the Parties did obtain two extensions of the close of
7 discovery and each such extension also extended the dispositive motions deadline.

8 The Parties propose a two-week extension of the remaining deadlines as
9 follows:

Dispositive Motions	Wednesday, April 18, 2018
Joint Pre-Trial Order	Friday, May 18, 2018

10
11
12 **CONCLUSION**

13 For the above-stated reasons, the Parties respectfully request that this Court
14 enter an Order granting this Stipulation and Order to Extend Dispositive Motions
15 Deadline and Deadline for Pretrial Order (Third Request).
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18 *(Remainder of Page Intentionally Left Blank)*
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1 This request is made in good faith and not for any improper purpose.

2 Dated: April 3, 2018.

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12 *Structured Asset Mortgage*
13 *Investments II, Inc., Bear Stearns*
14 *ALT-A Trust, Mortgage Pass-Through*
15 *Certificates Series 2006-6 and*
16 *Mortgage Electronic Registration*
17 *Systems, Inc.*

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23 *LLC*

22 IT IS SO ORDERED.

24 UNITED STATES MAGISTRATE JUDGE

25 Dated: 5-8-2018

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