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9 UNITED STATES DISTRICT COURT

10 CLARK COUNTY, NEVADA

11 DEUTSCHE BANK NATIONAL TRUST
 COMPANY, as Trustee for SECURITIZED
 12 ASSET BACKED RECEIVABLES LLC
 TRUST 2006-WM4,

13 Plaintiff,

14 vs.

15 BFP INVESTMENTS 2, LLC,

16 Defendant.

Case No. 2:16-cv-02895-JAD-VCF

**STIPULATION AND ORDER TO
 EXTEND TIME FOR BFP
 INVESTMENTS 2, LLC TO RESPOND TO
 MOTION TO CONTINUE DISCOVERY
 DEADLINES [ECF No. 50]**

(First Request)

18 Plaintiff Deutsche Bank National Trust Company, as Trustee for Securitized Asset Backed
 19 Receivables LLC Trust 2006-WM4 (“Deutsche Bank”) and BFP Investments 2, LLC (“BFP”)
 20 (collectively the “Parties”), by and through their respective undersigned counsel of record, hereby
 21 stipulate and agree to allow BFP an additional two (2) days to file its response to Deutsche Bank’s
 22 Motion to Continue Discovery Deadlines [ECF No. 50]. Specifically, the Parties stipulate to the
 23 following:

- 24 1. BFP’s current deadline to file a Response to Deutsche Bank’s Motion to Continue
 25 Discovery Deadlines [ECF No. 50] is June 11, 2020.
 26 2. The Parties agree that BFP may have an extension of two (2) days or until June 15, 2020
 27 to file its response.
 28

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- 1 3. BFP seeks this extension due to counsel's involvement in a Ninth Circuit oral argument
- 2 that took place on June 9, 2020 and a Nevada Supreme Court oral argument that takes place
- 3 June 11, 2020.
- 4 4. This is the first request for an extension of time.
- 5 5. The Parties stipulate to the foregoing in good faith and not for purposes of delay.

6
7 DATED this 11th day of June, 2020.

8 **KIM GILBERT EBRON**

9 /s/ Karen L. Hanks
10 Jacqueline A. Gilbert, Esq.
11 Nevada Bar No. 10593
12 Diana S. Ebron, Esq.
13 Nevada Bar No. 10580
14 7625 Dean Martin Drive, Suite 110
15 Las Vegas, NV 89139
16 Attorney for BFP Investments, 2 LLC

DATED this 11th day of June, 2020.

WRIGHT, FINLAY & ZAK, LLP

/s/ Robert A. Riether
Robert A Riether, Esq.
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17
18 **IT IS SO ORDERED**



19 UNITED STATES MAGISTRATE JUDGE

20 DATED: 6-11-2020

21 Respectfully submitted by:

22 **KIM GILBERT EBRON**

23 /s/ Karen L. Hanks
24 Jacqueline A. Gilbert, Esq.
25 Nevada Bar No. 10593
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27 Nevada Bar No. 10580
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of March, 2018, pursuant to FRCP 5, I served via the Court’s CM/ECF filing and service the foregoing **BFP INVESTMENTS 2, LLC’S OPPOSITION TO DEUTSCHE BANK NATIONAL TRUST COMPANY’S MOTION TO LIFT STAY [ECF NO. 35]; AND COUNTERMOTION TO CONTINUE STAY OF ALL PROCEEDINGS PENDING RESOLUTION OF CERTIFIED QUESTION** to the following parties:

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Natalie C. Lehman, Esq.
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Attorney for Plaintiff,
Deutsche Bank National Trust Company, as Trustee for Securitized Asset Backed Receivables LLC Trust 2006-WM4

/s/ Alexander Loglia
An employee of KIM GILBERT EBRON

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