935 VILLAGE CENTER CIRCLE

Kent F. Larsen, Esq. Nevada Bar No. 3463 Christopher L. Benner, Esq. Nevada Bar No. 8963 SMITH LARSEN & WIXOM 1935 Village Center Circle Las Vegas, Nevada 89134 Tel: (702) 252-5002 Fax: (702) 252-5006 Email: kfl@slwlaw.com clb@slwlaw.com Attorneys for Plaintiff, JPMorgan Chase Bank, N.A. UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA** JPMORGAN CHASE BANK, N.A., Plaintiff, v. SFR INVESTMENTS POOL 1, LLC, a Nevada limited liability company; THREE TURNBERRY PLACE, a Nevada non-profit corporation; JEROME ROSENBERG, an individual, and 2747 PARADISE, A SERIES OF LUCKY AMY NAN, LLC, a Nevada limited liability company. Counter/Cross Defendant s. SFR INVESTMENTS POOL 1, LLC, a Nevada limited liability company; Counter/Cross Claimant JPMORGAN CHASE BANK, N.A.: M.G.L. LIVING TRUST; IMELDA B. AQUINO, an individual; JEROME ROSENBERG, an individual; and 2747 PARADISE, A SERIES OF LUCKY AMY NAN, LLC, a Nevada limited liability company, Counter/Cross Defendant

CASE NO.: 2:17-CV-00349-GMN-NJK

SECOND STIPULATION AND **[PROPOSED]** ORDER TO EXTEND **DEADLINE FOR STIPULATION** OF DISMISSAL AND PROPOSED **ORDER** 

## SMITH LARSEN & WIXOM

## A T T O R N E Y S HILLS CENTER BUSINESS PARK 1935 VILLAGE CENTER CIRCLE LAS VEGAS, NEVADA 89134 (702) 252-5002 · (702) 252-5006

JPMORGAN CHASE BANK, N.A. ("Chase"), SFR INVESTMENTS POOL 1, LLC ("SFR"), and THREE TURNBERRY PLACE ASSOCIATION ("Association") (collectively, the "Parties") by and through their respective counsel of record, hereby stipulate to extend the deadline for filing of the Stipulation of Dismissal and Proposed Order as ordered on March 6, 2018, pursuant to the Settlement Conference of the same date before Magistrate Judge Nancy J. Koppe, and as previously extended on June 4, 2018, as follows:

- 1. The settlement of this matter is part of a larger settlement between Chase and SFR involving multiple additional properties.
- 2. Due to the involvement of multiple properties, the final execution of a settlement agreement memorializing the terms of the settlement has been delayed.
- 3. The parties have exchanged drafts of the proposed agreement and have nearly finalized same, with execution to follow.
- 4. The parties have agreed that additional time is necessary to finalize the settlement agreement, and thus require additional time to submit the Stipulation of Dismissal and Proposed Order in this matter
- 5. Based thereon, the parties seek to extend the deadline for the Stipulation of Dismissal and Proposed Order in this matter by 21 days, to August 9, 2018.

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A T T O R N E Y S HILLS CENTER BUSINESS PARK 1935 VILLAGE CENTER CIRCLE LAS VEGAS, NEVADA 89134 (702) 252-5002 · (702) 252-5006 6. This is the second request for an extension of this deadline, the prior request being for 45 days, and it is not made for the purposes of delay. The additional time requested is to allow counsel to finalize, execute, and effectuate the necessary terms of the settlement between the parties.

DATED this 16 <sup>th</sup> day of July, 2018.	DATED this 16 <sup>th</sup> day of July, 2018.
KIM GILBERT EBRON	SMITH LARSON & WIXOM
/s/ Diana S. Ebron Diana S. Ebron, Esq. Nevada Bar No. 10580 Jacqueline A. Gilbert, Esq. Nevada Bar No. 10593 Karen L. Hanks, Esq. Nevada Bar No. 9578 7625 Dean Martin Drive, Suite 110 Las Vegas, Nevada 89139-5974	/s/ Christopher L. Benner Kent F. Larsen, Esq. Nevada Bar No. 3463 Christopher L. Benner, Esq. Nevada Bar No. 8963 1935 Village Center Circle Las Vegas, Nevada 89134-6237 Attorneys for JPMorgan Chase Bank, N.A.
Attorney for SFR Investments Pool 1, LLC	
DATED this <u>16<sup>th</sup></u> day of July, 2018.  LIPSON NEILSON COLE SELTZER & GARIN	
/s/ Eric Tran Eric Tran, Esq. Nevada Bar No. 11876 9900 Covington Cross Dr., Suite 120 Las Vegas, NV 89144 Attorney for Three Turnberry Place Association	

## **ORDER**

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: July 17, 2018