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 11 *C-BASS Mortgage Loan Asset Backed Certificates, Series 2006-CB4*

12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 U.S. BANK NATIONAL ASSOCIATION, AS
 15 TRUSTEE, FOR THE C-BASS MORTGAGE
 16 LOAN ASSET BACKED CERTIFICATES,
 17 SERIES 2006-CB4,

Case No.: 2:17-cv-00493-RFB-PAL

**STIPULATION AND ORDER TO
 EXTEND DISPOSITIVE MOTION
 DEADLINE**

18 Plaintiff,

(FIRST REQUEST)

19 vs.

20 PANDA LLC SERIES 6233 HALSTEAD;
 21 SHADOW SPRINGS COMMUNITY
 22 ASSOCIATION; RED ROCK FINANCIAL
 23 SERVICES,

24 Defendants.

25 PANDA LLC SERIES 6233 HALSTEAD,

26 Counterclaimant,

27 vs.

28 U.S. BANK NATIONAL ASSOCIATION, AS
 TRUSTEE, FOR THE C-BASS MORTGAGE
 LOAN ASSET BACKED CERTIFICATES,
 SERIES 2006-CB4,

Counter-Defendant.

SHADOW SPRINGS COMMUNITY
 ASSOCIATION,

Cross-Claimant,

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vs.
RED ROCK FINANCIAL SERVICES,
Cross-Defendant.
RED ROCK FINANCIAL SERVICES,
Counter-Claimant,
vs.
SHADOW SPRINGS COMMUNITY
ASSOCIATION,
Counter-Defendant.

COMES NOW Plaintiff/Counter-Defendant, U.S. Bank National Association, as Trustee, for the C-BASS Mortgage Loan Asset Backed Certificates, Series 2006-CB4 (“U.S. Bank”), Defendant/Counterclaimant, Panda LLC Series 6233 Halstead, Defendant/Counter-Claimant Red Rock Financial Services, and Defendant/Counter-Defendant, Shadow Springs Community Association (“Shadow Springs”), by and through undersigned and respective counsel of record, and hereby stipulate as follows:

As previously indicated to the Court, U.S. Bank originally attempted to depose the 30(b)(6) witness for Shadow Springs prior to the close of discovery, however, Shadow Springs’ witness failed to attend on two separate occasions. The deposition of the designated witness for Shadow Springs is currently scheduled for January 23, 2018, while dispositive motions are currently due by January 29, 2018. The parties are requesting an extension of the dispositive motion deadline so that the parties have additional time to fully brief the Court in this matter.

LR 26-4 requires a stipulation to extend a deadline to be made no later than 21 days before the subject deadline and if made within 21 days of the deadline, it must be supported by a showing of good cause. This stipulation is within 21 days of the discovery deadline (January 29, 2018). Good cause exists to extend the discovery deadline, namely Shadow Springs’ last minute cancellation of the Rule 30(b)(6) deposition on both December 20, 2017, and January 4, 2018.

1 IT IS HEREBY STIPULATED AND AGREED that the Parties shall have an extension
2 of thirty (30) days, up to and until February 28, 2018, to file their respective Motions for
3 Summary Judgment.

4 This is the parties' first request for extension of the dispositive motions deadline. This
5 request is not intended to cause any delay or prejudice to any party.

6 DATED this 17th day of January, 2018.

DATED this 17th day of January, 2018.

7 WRIGHT, FINLAY & ZAK, LLP

KOCH & SCOW LLC

8 /s/ Krista J. Nielson

/s/ Steven B. Scow

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Financial Services*

15 DATED this 17th day of January, 2018.

DATED this 17th day of January, 2018.

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AYON LAW, PLLC

17 /s/ Gianna M. Orlandi

/s/ Luis A. Ayon

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ORDER

24 IT IS SO ORDERED.

25 Dated this 19th day of January, 2018.


UNITED STATES MAGISTRATE JUDGE