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9 Attorney for *Bank of New York Mellon, as*  
10 *Successor to JPMorgan Chase Bank, Not*  
11 *Individually But Solely As Trustee for the*  
12 *Holder of the Bear Stearns ALT-A Trust 2005-1,*  
13 *Mortgage Pass-Through Certificates Series 2005-1*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

14 THE BANK OF NEW YORK MELLON  
15 F/K/A THE BANK OF NEW YORK AS  
16 SUCCESSOR TO JPMORGAN CHASE  
17 BANK, NOT INDIVIDUALLY BUT  
18 SOLELY AS TRUSTEE FOR THE  
19 HOLDERS OF THE BEAR STEARNS ALT-  
20 A TRUST 2005-1, MORTGAGE PASS-  
21 THROUGH CERTIFICATES, SERIES 2005-  
22 1,

23 Plaintiff,

24 vs.

25 PREMIER ONE HOLDINGS INC., a Nevada  
26 corporation; YING M. SHIH, an individual;  
27 SMM Capital LLC, a Nevada limited liability  
28 company; BIN ZHANG, an individual;  
AMBER HILLS II HOMEOWNERS'  
ASSOCIATION, INC., a Nevada non-profit  
corporation; ABSOLUTE COLLECTION  
SERVICES LLC, a Nevada limited liability  
company; DOE INDIVIDUALS I through X;  
and ROE CORPORATIONS I through X,  
inclusive,

Defendants.

Case No.: 2:17-cv-00737-JCM-VCF

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE  
ON DEFENDANTS' MOTION FOR  
RELIEF FROM A JUDGMENT AND  
REQUEST FOR JUDICIAL NOTICE  
OF MOTION FOR RELIEF FROM A  
JUDGMENT (ECF NOS.  
53 AND 54)**

**(FIRST REQUEST)**

Plaintiff, BANK OF NEW YORK MELLON, AS SUCCESSOR TO JPMORGAN  
CHASE BANK, NOT INDIVIDUALLY BUT SOLELY AS TRUSTEE FOR THE HOLDER

1 OF THE BEAR STEARNS ALT-A TRUST 2005-1, MORTGAGE PASS-THROUGH  
2 CERTIFICATES SERIES 2005-1 (“BNYM”) and Defendants, PREMIER ONE HOLDINGS,  
3 INC., SMM CAPITAL LLC, YING SHIH, and BIN ZHANG by and through their respective  
4 undersigned counsel of record, hereby stipulate and agree as follows. December 11, 2018 is the  
5 current deadline for Plaintiff to respond to Defendants, PREMIER ONE HOLDINGS, INC.,  
6 SMM CAPITAL LLC, YING SHIH, and BIN ZHANG’s Motion for Relief From A Judgment  
7 and Request for Judicial Notice of Motion for Relief from a Judgment (ECF Nos. 53 and 54,  
8 filed November 27, 2018, the “Motions”).

9 The Parties stipulate and agree that Plaintiff has up to and including December 18, 2018  
10 to respond to the Motion. The amount of time is requested given the entrance of Plaintiff’s new  
11 counsel in the matter and necessary time for review of pleadings and related documents.  
12 Further, the parties submit this stipulation in good faith and not for purposes of delay.

13 MORRIS LAW CENTER

THE BALL LAW GROUP

14 /s/ Timothy A. Wiseman, Esq.

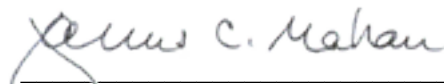
/s/ Zachary T. Ball, Esq.

15 By: \_\_\_\_\_  
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23 *SMM Capital LLC, Ying Shih, and Bin*  
24 *Zhang*

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Attorney for *Bank of New York Mellon*

20 **ORDER**

21 **IT IS SO ORDERED.**

22   
23 \_\_\_\_\_  
24 UNITED STATES DISTRICT JUDGE

25 DATED: December 14, 2018  
26 \_\_\_\_\_  
27  
28