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12 *Attorneys for Plaintiffs Wells Fargo Bank, N.A. and*  
13 *Federal National Mortgage Association*

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 WELLS FARGO BANK, N.A., a national  
17 banking association; FEDERAL NATIONAL  
18 MORTGAGE ASSOCIATION;

19 Plaintiff,

20 vs.

21 GRACIELA ZAMORA TORRES, an  
22 individual; OCTAVIO CANO-MARTINEZ,  
23 an individual; APACHE HILLS HOME  
24 OWNERS’ ASSOCIATION, INC., a Nevada  
25 non-profit corporation;

26 Defendants.

Case No. 2:17-cv-01324-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO FILE  
DISPOSITIVE MOTIONS**

**(First Request)**

27 Plaintiffs Wells Fargo Bank, N.A. and Federal National Mortgage Association (the  
28 “Plaintiffs”), together with Defendant Apache Hills Home Owners’ Association, Inc. (“Apache  
Hills” and jointly with Plaintiffs, the “Parties”), through their counsel hereby respectfully request  
the Court enter an order, pursuant to Local Rules IA 6-1 and 26-4, extending the dispositive motion  
deadlines set forth in the Scheduling Order entered on November 26, 2018 (ECF No. 23). The  
dispositive motion deadline in the Scheduling Order has not expired and is currently scheduled for  
June 19, 2019. The Parties request an extension for 60 days until Monday, August 19, 2019.

1           **I.       Good Cause for Extending Deadline for Filing Dispositive Motions**

2           This requested extension is the result of a contingent resolution of this matter between the  
3 Parties. Plaintiffs will file an application for default judgment by June 7, 2019, against the non-  
4 appearing defendants, Graciela Zamora Torres and Octavio Cano-Martinez (“Non-appearing  
5 Defendants”). Resolution of the litigation between the Parties currently depends upon the Plaintiffs  
6 obtaining default judgment against the Non-appearing Defendants. The Clerk has already entered  
7 default against the Non-appearing Defendants (ECF No. 28), and the Parties anticipate obtaining  
8 default judgment against the Non-appearing Defendants in a timely manner. Once Plaintiffs obtain  
9 default judgment, the Parties will submit a stipulation and order dismissing the litigation.

10          This is the Parties’ first stipulated request to extend the deadlines. This request is not made for  
11 any deleterious purpose or to cause delay, but is made in good faith by the Parties as the result of  
12 the tentative resolution of this matter in its entirety.

13           **II.       Proposed Schedule**

14          The Parties respectfully request that the Court extend the dispositive motion deadline by  
15 60 days until Monday, August 19, 2019.

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The Parties respectfully request that the Court grant this Stipulation and extend the dispositive motion deadline as set forth herein.

Dated: June 5, 2019

Dated: June 5, 2019

WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN LLP

SNELL & WILMER L.L.P.

By: /s/ /s/ Gregory P. Kerr

By: /s/ Wayne Klomp

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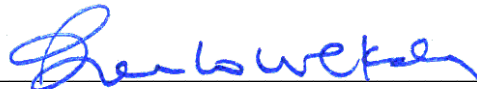
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*Attorneys for Defendant Apache Hills Home  
Owners' Association, Inc.*

*Attorneys for Plaintiffs Wells Fargo Bank,  
N.A. and Federal National Mortgage  
Association*

**ORDER**

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: June 6, 2019

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court’s CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: June 5, 2019.

/s/ Lara J. Taylor  
An Employee of Snell & Wilmer L.L.P.