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8 *Attorneys for Plaintiff Wells Fargo Bank, N.A.*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 WELLS FARGO BANK, N.A.,
12 Plaintiff,

13 vs.

14 SATICOY BAY LLC – SERIES 3948
15 APPLECREST, a Nevada limited-liability
company; WOODCREST HOMEOWNERS
16 ASSOCIATION; a Nevada non-profit
corporation; ABSOLUTE COLLECTION
17 SERVICES, LLC, a Nevada limited-liability
company; DOES 1 through 10; and ROE
18 BUSINESS ENTITIES 1 through 10, inclusive,
19 Defendants.

Case No. 2:17-cv-1360-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO AMEND
PLEADINGS AND ADD PARTIES**

**(First Requested Extension After Lift of
Stay)**

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21 Pursuant to Local Rules 6-1 and 26-4, the parties stipulate, and request that the Court
22 approve, a fourteen-day extension of the deadline to amend pleadings and add parties from May
23 14, 2019 to May 28, 2019. The parties do not seek any other extension of the existing case deadlines
24 at this time. Wells Fargo is still reviewing information related to the possible elimination and
25 substitution of claims and needs a brief, two-week extension to finalize and file its Amended
26 Complaint. This is the first request (post lift of stay) for an extension of deadlines contained within
27 the discovery plan and scheduling order.
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This request comes less than twenty-one days before expiration of the current deadline to amend pleadings, and, therefore, must be supported by good cause. Good cause exists to extend the deadline here, as the parties are currently conducting discovery and locating the information needed to finalize their amended pleadings, but need a brief extension to confirm additional information regarding their claims.

The parties are amicably, professionally, diligently, and in good faith working toward the completion of discovery in this matter. The request for additional time at this point reflects the need for the parties to plan strategically based on the full factual and legal record -- not any dilatory conduct by any party. The stipulated extension will also eliminate the need for expensive, time-consuming motions for both the parties and the court. No prejudice will result from the requested extension, as the parties currently anticipate that they will be able to complete discovery on or before the August 2019 deadline.

For these reasons, and based on the circumstances, the parties request an extension of the dispositive motions deadlines and subsequent deadlines as follows:

This stipulated request is submitted in good faith for the reasons explained above, and not for purposes of undue delay.

1 Dated: May 9, 2019

2 LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD. SNELL & WILMER L.L.P.

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4 /s/ Nikoll Nikci
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N.A.*

9 *Attorneys for Defendant Saticoy Bay LLC Series
3948 Applecrest*

10 **e-signature affixed with permission*

11 HOA LAWYERS GROUP, LLC

ABSOLUTE COLLECTION SERVICES, LLC

12
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16 *Attorneys for Defendant Woodcrest
Homeowners Association*

*Attorney for Defendant Absolute Collection
Services, LLC*

17 **e-signature affixed with permission*

**e-signature affixed with permission*

18
19 **SCHEDULING ORDER**

20 The deadline to amend pleadings and add parties is hereby extended from May 14, 2019
21 to May 28, 2019. All other current deadlines remain in effect.

22 IT IS SO ORDERED.

23
24 United States Magistrate Judge

25 5-10-2019

26 Dated: _____

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically transmitted the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO AMEND PLEADINGS AND ADD PARTIES** with the Clerk of Court for the U.S. District Court, District of Nevada by using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

DATED: May 9, 2019

/s/ Susan Ballif
An employee of SNELL & WILMER L.L.P.

4819-1705-3078