1 ASHLIE L. SURUR, ESQ. Nevada Bar No. 11290 2 asurur@lawhjc.com 3 HALL, JAFFE & CLAYTON, LLP 7425 Peak Drive 4 Las Vegas, Nevada 89128 (702) 316-4111 5 Fax (702) 316-4114 Attorneys for Castlegate 6 Homeowners Association 7 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 WELLS FARGO BANK, N.A.; a national Case No.: 2:17-cv-01510-RFB-NJK banking association, 11 Plaintiff. STIPULATION AND ORDER TO 12 **EXTEND RENEWED MOTION DEADLINE** VS. 13 (Third Request) SATICOY BAY LLC, SERIES 1304 14 KINGDOM, a Nevada limited-liability company, CASTLEGATE HOMEOWNERS 15 ASSOCIATION, a Nevada non-profit corporation; LEACH JOHNSON SONG & GRUCHOW, LTD., a Nevada limited-liability 16 company; 17 Defendants. 18 19 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, the parties, by and through their respective attorneys of record, stipulate as follows: 20 21 1. On August 23, 2018 the parties filed a Stipulation and Order to Extend Motion 22 Deadline pursuant to the court's July 13, 2018 Amended Order. ECF No. 56. 2. 23 On August 27, 2018, the court issued a minute order granting in part and denying in part the parties' Stipulation and Order to Extend Motion Deadline per July 13, 2018 24 25 Amended Order. ECF No. 57. The court granted an extension for all renewed motions to be filed on or before September 24, 2018. Id. 26 27 3. The parties requested and obtained an extension to file all renewed motion to 28 October 24, 2018. ECF No. 62.

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4. The parties are still actively engaging in settlement negotiations. The parties agree that extending the current deadline for filing renewed motions is necessary to the viability of these negotiations, particularly as it will conserve litigation costs and allow the parties to continue to focus their resources on settlement. Negotiations in this case require additional time, because the HOA must obtain approval from the HOA's Board for authority. Wells Fargo has presented a formal written settlement offer to the HOA, and it is currently under evaluation. The parties are working as quickly as possible and are not seeking this extension to unduly delay this action. This extension is made in good faith for the sole purpose of providing the parties the additional time they need to pursue settlement. This constitutes good cause to extend the renewed motion deadline by thirty (30) days or until November 23, 2018 and demonstrates excusable neglect for the timing of the submission of this stipulation.

5. Plaintiff settled its claims against Saticoy Bay on or about September 12, 2018 [ECF No. 59], so the only remaining parties with an interest in this requested relief are Plaintiff and the HOA.

Dated: October 24, 2018. Dated: October 24, 2018.

SNELL & WILMER L.L.P.

By: /s/Tanya N. Lewis Robin E Perkins, Esq. Nevada Bar No. 9891 Tanya N. Lewis, Esq. Nevada Bar No. 8855

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

Attorneys for Wells Fargo Bank, N.A.

ORDER

IT IS SO ORDERED:

RICHARD F. BÖULWARE, II

HALL, JAFFE & CLAYTON, LLP

/s/Ashlie L. Surur

Ashlie L. Surur, Esq. Nevada Bar No.11290

Las Vegas, Nevada 89128

Attorneys for Castlegate

Homeowners Association

7425 Peak Drive

UNITED STATES DISTRICT JUDGE

DATED this 25th day of October, 2018.

1	<u>CERTIFICATE OF SERVICE</u>
2	I certify that on October 24, 2018, I served a true and correct copy of the foregoing
3	STIPULATION AND ORDER TO EXTEND RENEWED MOTION DEADLINE
4	(Third Request) on the following parties by electronic transmission through the Court's
5	electronic filing system:
6 7 8 9	Tanya N. Lewis, Esq Snell & Wilmer L.L.P. 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 Attorneys for Wells Fargo Bank, N.A.
10	Michael F. Bohn, Esq. Adam R. Trippiedi, Esq. LAW OFFICES OF MICHAEL F. BOHN, ESQ. 376 East Warm Springs Road, Ste. 140 Las Vegas, Nevada 89119 Attorneys for Saticoy Bay LLC, Series 1304 Kingdom
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14	Alex Raleigh_ An Employee of HALL JAFFE & CLAYTON, LLP
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