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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

U.S. BANK N.A., SUCCESSOR TRUSTEE TO BANK OF AMERICA, N.A., SUCCESSOR IN INTEREST TO LASALLE BANK N.A., ON BEHALF OF THE REGISTERED HOLDERS OF BEAR STEARNS ASSET BACKED SECURITIES I LLC, ASSET-BACKED CERTIFICATES, SERIES 2005-HE6,

Plaintiff,

VS.

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TERRAFIRMA VENTURE LLC, a Nevada corporation; TREASURES LANDSCAPE MAINTENANCE ASSOCIATION, a Nevada non-profit corporation,

Defendants.

Case No. 2:17-cv-01890-JCM-NJK

CORRECTED STIPULATION AND ORDER TO EXTEND TIME FOR U.S. BANK TO RESPOND TO TERRAFIRMA VENTURE LLC'S MOTION TO DISMISS [DKT. 19] AND TREASURES LANDSCAPE MAINTENANCE ASSOCIATION'S MOTION TO DISMISS OR, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT [DKT. 18]

(SECOND REQUEST)¹

December 21, 2017 is the current deadline for Plaintiff, U.S. Bank N.A.,

DMWEST #17334204 v1

¹ The Court entered a minute order on December 21, 2017 instructing the Parties to resubmit a corrected stipulation that complies with Local Rule IA 6-1(c). (Dkt. 27.) The Parties have corrected the stipulation and order so that it complies with the Local Rule IA 6-1(c).

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980 Festival Plaza Drive, Suite 900 LAS VEGAS, NEVADA 89135

BALLARD SPAHR LLP

Successor Trustee to Bank of America, N.A., Successor in Interest to LaSalle Bank N.A., on Behalf of The Registered Holders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed Certificates, Series 2006-HE6 (the "Trust") to respond to Treasures Landscape Maintenance Association's Motion to Dismiss, or in the Alternative, Motion for Summary Judgment (Dkt. 18), and Defendant, Terrafirma Venture LLC's Motion to Dismiss Plaintiff's Complaint (Dkt. 19) (collectively, the "Motions to Dismiss"), both of which were filed November 27, 2017. This Court granted the Parties' first stipulation for extension of time to respond on December 15, 2017 (Dkt. 25). Because of the numerous arguments raised in support of motions to dismiss and the Treasures Landscape Maintenance Association's alternative motion for summary judgment, as well as the significant number of end-of-year deadlines, the Trust needs additional time to adequately address each argument for the Court. Defendant Terrafirma Venture LLC and Treasures Landscape Maintenance Association stipulate and agree that the Trust has up to and including January 4, 2018 to respond to the Motions to Dismiss.

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The parties submit this stipulat	ion in good faith and not for purposes of delay.
Dated: this 21st day of December	er, 2017.
Lipson, Neilson, Cole, Seltzer & Garin, P.C.	, The Ball Law Group
	D . / / 7 . 1
<u> </u>	By: <u>/s/ Zachary T. Ball</u> Zachary T. Ball
Nevada Bar No. 7582	Nevada Bar No. 8364
Nevada Bar No. 9272	3455 Cliff Shadows Parkway Suite 150
9900 Covington Cross Drive, Suite 120	Las Vegas, Nevada 89129
	Attorney for Terrafirma Venture LLC
-	
DALLARD SPAHR LLP	
By: /s/ Justin A Shiroff	
Abran E. Vigil	
Nevada Bar No. 12869	
Las Vegas, Nevada 89135	
Attorneys for Plaintiff	
	IT IS SO ORDERED.
	Xellus C. Mahan
	United States District Judge
	DATED December 29, 2017.
	Lipson, Neilson, Cole, Seltzer & Garin, P.C. By: /s/ Lisa J. Zastrow Kaleb D. Anderson, Esq. Nevada Bar No. 7582 Lisa J. Zastrow, Esq. Nevada Bar No. 9272 9900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144 Attorneys for Defendant, Treasures Landscape Maintenance Association BALLARD SPAHR LLP By: /s/ Justin A. Shiroff Abran E. Vigil Nevada Bar No. 7548 Justin A. Shiroff Nevada Bar No. 12869 1980 Festival Plaza Drive, Suite 900

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