

**THE BALL LAW GROUP**  
3455 Cliff Shadows Parkway, Suite 150  
Las Vegas, Nevada 89129  
(702) 303-8600

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Zachary T. Ball, Esq.  
Nevada Bar No. 8364  
**THE BALL LAW GROUP**  
3455 Cliff Shadows Parkway  
Suite 150  
Las Vegas, Nevada 89129  
Telephone: (702) 303-8600  
Email: zball@balllawgroup.com  
Attorney for *Terrafirma Venture LLC*

**UNITED STATE 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.

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

Defendants.

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

**STIPULATION AND ORDER TO  
EXTEND TIME FOR TERRAFIRMA  
VENTURE LLC AND DEFENDANT  
TREASURES LANDSCAPE  
MAINTENANCE ASSOCIATION TO  
RESPOND TO U.S. BANK’S  
OPPOSITION TO MOTION TO  
DISMISS [DKT. 30]**

**(FIRST REQUEST)**

In this matter, Defendant, TERRAFIRMA VENTURE, LLC (“TERRAFIRMA”) filed a Motion to Dismiss on November 27, 2017 (Dkt. 19) and Plaintiff filed its Opposition to this motion on January 4, 2018 (Dkt. 30). Defendant TREASURES LANDSCAPE MAINTENANCE ASSOCIATION (“TREASURES”) filed a Motion to Dismiss or, in the Alternative, Motion for Summary Judgment on November 27, 2017 (Dkt. 18) and Plaintiff filed its Opposition to this motion on January 4, 2018 (Dkt. 31). January 11, 2017 is the current deadline for TERRAFIRMA and TREASURES to respond to Plaintiff’s Oppositions.

Based on conflicting deadlines in other matters as well as the numerous arguments raised

1 in Plaintiff's Oppositions, TERRAFIRMA and TREASURES need additional time to fully  
2 respond. Therefore, Plaintiff, TREASURES and TERRAFIRMA stipulate and agree that  
3 TERRAFIRMA and TREASURES have up to and including January 28, 2018 to file responses  
4 to Plaintiff's Oppositions. The parties submit this stipulation in good faith and not for purposes  
5 of delay.

6 DATED this 11<sup>th</sup> day of January, 2018.

DATED this 11<sup>th</sup> day of January, 2018.

7 LIPSON, NEILSON, COLE, SELTZER &  
8 GARIN, P.C.

BALLARD SPAHR LLP

9  
10 /s/ Lisa J. Zastrow, Esq.

/s/ Justin A. Shiroff, Esq.

11 \_\_\_\_\_  
Kaleb D. Anderson, Esq.  
Nevada Bar No. 7582  
12 Lisa J. Zastrow, Esq.  
Nevada Bar No. 9272  
13 9900 Covington Cross Drive, Ste. 120  
14 Las Vegas, Nevada 89144  
15 Attorney for *Defendant, Treasures*  
*Landscape Maintenance Association*

\_\_\_\_\_

Abran E. Vigil, Esq.  
Nevada Bar No. 7548  
Justin A. Shiroff, Esq.  
Nevada Bar No. 12869  
100 North City Parkway, Suite 1750  
Las Vegas, Nevada 89106  
Attorneys for *Plaintiff*

16 DATED this 11<sup>th</sup> day of January, 2018.

17 THE BALL LAW GROUP LLC

18  
19 /s/ Zachary T. Ball, Esq.

20 \_\_\_\_\_  
Zachary T. Ball, Esq., SBN 8364  
3455 Cliff Shadows Pkwy., Ste. 150  
21 Las Vegas, Nevada 89129  
22 Attorney for *Terrafirma Venture LLC*

23  
24 **IT IS SO ORDERED.**

25  
26   
27 \_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

28 DATED this: January 11, 2018