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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

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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 11th day of January, 2018. DATED this 11th day of January, 2018.

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

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

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

19 DATED this 11th day of January, 2018.

20 THE BALL LAW GROUP LLC

21 /s/ Zachary T. Ball, Esq.

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24 Las Vegas, Nevada 89129
25 Attorney for *Terrafirma Venture LLC*

26 /s/ Justin A. Shiroff, Esq.

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29
30 IT IS SO ORDERED.

31 
32 UNITED STATES DISTRICT JUDGE

33 DATED this: January 11, 2018