12

13

14

17

18

19

21

22

23

24

25

26

27

28

1	Abran E. Vigil
	Nevada Bar No. 7548
2	Justin A. Shiroff
	Nevada Bar No. 12869
3	BALLARD SPAHR LLP
	1980 Festival Plaza Drive, Suite 900
4	Las Vegas, Nevada 89135
	Telephone: (702) 471-7000
5	Facsimile: (702) 471-7070
	vigila@ballardspahr.com
6	shiroffj@ballardspahr.com
7	Attorneys for Plaintiff U.S. Bank
	N.A., successor trustee to Bank of
8	America, N.A., successor in interest
	to LaSalle Bank N.A., on behalf of
9	the registered holders of Bear
	Stearns Asset Backed Securities I
10	LLC, Asset-Backed Certificates,
	Series 2005-HE6
11	

## 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,

 $\parallel vs.$ 

20 TERRAFIRM

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

Defendants.

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

STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE ON TREASURES LANDSCAPE MAINTENANCE ASSOCIATION'S MOTION TO DISMISS OR, IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT (ECF NOS. 57 AND 58)

(FIRST REQUEST)

Plaintiff U.S. Bank NA, Successor Trustee to Bank of America, NA, 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

DMWEST #18295277 v1

## Case 2:17-cv-01890-JCM-NJK Document 60 Filed 11/27/18 Page 2 of 3

LAS VEGAS, NEVADA 89135 (702) 471-7000 FAX (702) 471-7070

BALLARD SPAHR LLP

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

1980 Festival Plaza Drive, Suite 900

(the "Trust"), and Defendant Treasures Landscape Maintenance Association ("Treasures"), (collectively the "Parties"), by and through their respective undersigned counsel of record, hereby stipulate and agree as follows. November 27, 2018 and December 4, 2018 are the current, respective deadlines for the Trust to respond to Treasures Landscape Maintenance Association's Motion to Dismiss, or in the Alternative, Motion for Summary Judgment (ECF Nos. 57 and 58, filed November 13, 2018, the "Motions").

In an effort to allow settlement negotiations between the Parties to this Stipulation to proceed (where the Trust and Defendant Terrafirma Venture LLC have already reached an agreement in principle), the Parties stipulate and agree that the Trust has up to and including January 11, 2019 to respond to the Motion. The amount of time requested is necessary, as even though the Parties will pursue settlement with the utmost diligence, it may take the considerable additional time to secure the requisite approvals, due to limiting factors such as when Board meetings are held, etc.

(Remainder of Page Intentionally Left Blank)

2

## Case 2:17-cv-01890-JCM-NJK Document 60 Filed 11/27/18 Page 3 of 3

	1	The parties submit this stipu	lation in good faith and not for purposes of	
	2	delay.		
1980 Festival Plaza Drive, Suite 900 LAS VEGAS, NEVADA 89135 (702) 471-7000 FAX (702) 471-7070	3	Dated: November 27, 2018		
	4	D C I I D	Langua Naragon Con a Caranna 0	
	5	BALLARD SPAHR LLP	Lipson, Neilson, Cole, Seltzer & Garin, P.C.	
	6	/s/ Justin A. Shiroff	/s/ Lisa J. Zastrow	
	7	Abran E. Vigil (SBN 7548) Justin A. Shiroff (SBN 12869)	Kaleb D. Anderson, Esq. (SBN 7582)	
	8	One Summerlin	Lisa J. Zastrow, Esq. (SBN 9272) 9900 Covington Cross Drive,	
	9	1980 Festival Plaza Drive, Suite 900 Las Vegas, Nevada 89135-2958	Suite 120 Las Vegas, Nevada 89144	
	10	Attorneys for Plaintiff	Attorneys for Defendant, Treasures Landscape Maintenance Association	
	11		Danuscape Mannenance Association	
	12			
	13			
	14			
	15			
	16		IT IS SO ORDERED.	
	17			
	18			
	19		United States District Judge	
	20		November 30, 2018	
	21		DATED:	
	22			
	23			
	24			
	<ul><li>25</li><li>26</li></ul>			
	26 27			
	28			

1980 Festival Plaza Drive, Suite 900

BALLARD SPAHR LLP