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9  
10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 JPMORGAN CHASE BANK, N.A.,  
13  
14 Plaintiff,

15 vs.

16 TERRAFIRMA VENTURE LLC, a Nevada  
17 limited liability company; AZURE  
ESTATES OWNERS ASSOCIATION, a  
Nevada non-profit corporation;  
ADRIENNE LOVE, an individual,

Defendants.

Case No. 2:17-cv-01928-RFB-NJK

**STIPULATION AND ORDER TO  
EXTEND SCHEDULING ORDER  
DEADLINES BY 30 DAYS**

**(First Request)**

18 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff JPMorgan Chase Bank, N.A.  
19 (“Chase”), Defendant TerraFirma Venture LLC (“TerraFirma”) and Defendant Azure  
20 Estates Owners Association (“Azure”), by and through their counsel of record, hereby  
21 stipulate and request that this Court extend discovery and dispositive motion  
22 deadlines in the above-captioned case for 30 days, to permit the parties to complete  
23 written discovery and party depositions. The parties have conferred and agree that  
24 this brief extension is the most reasonable given the Chapter 7 bankruptcy filing of  
25 nominal Defendant Adrienne Love. *See* Notice of Bankruptcy Filing, at ECF No. 25.  
26 A Motion for Relief from Automatic Stay is pending before the United States  
27 Bankruptcy Court for the Central District of California.

28 ///

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1 This is the parties' first request for an extension to the discovery deadlines,  
2 which were submitted in compliance with LR 26-1. The parties make this request in  
3 good faith and not for purposes of delay.

4 **I. Discovery Completed to Date**

5 To date, Chase has served initial disclosures. No other discovery has been  
6 served.

7 **II. Discovery that Remains to be Completed**

8 Due to Ms. Love's Chapter 7 Bankruptcy filing, extensive discovery remains to  
9 be completed.

10 **III. Good Cause Exists for the Requested Extension**

11 Good cause exists for the requested extension, as it will provide time for the  
12 parties to exchange expert witness information, and complete written discovery and  
13 schedule depositions. To date, Chase has served initial disclosures. On November 7,  
14 2017, a Notice of Bankruptcy filing was filed at ECF No. 25 regarding nominal  
15 defendant Adrienne Love's Chapter 7 bankruptcy pending in the United States  
16 Bankruptcy Court for the Central District of California. A Motion for Relief from  
17 Automatic Stay is currently pending, and scheduled to be heard on December 14,  
18 2017. Accordingly, the parties desire to extend the Scheduling Order deadlines by 30  
19 days pending the determination of the Motion for Relief from Automatic Stay.

20 Finally, this is the parties' first request to extend the standard, 180-day  
21 discovery period in this case, and they seek only a brief 30-day extension. The  
22 parties seek this extension in good faith.

23 **IV. Proposed Deadlines**

24 The parties request an order extending the exchange of expert information, the  
25 interim status report, the close of discovery, the deadline to file dispositive motions,  
26 and the deadline to file a pre-trial order by 30 days.

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| Event                                    | Current Deadline <sup>1</sup> | New Deadline     |
|--|-------------------------------|------------------|
| Exchange of experts and expert reports   | December 7, 2017              | January 8, 2018  |
| Interim Status Report                    | December 7, 2017              | January 8, 2018  |
| Exchange of rebuttal experts and reports | January 8, 2018               | February 7, 2018 |
| Close of Discovery                       | February 5, 2018              | March 7, 2018    |
| Dispositive Motions                      | March 7, 2018                 | April 6, 2018    |
| Pre-Trial Order <sup>2</sup>             | April 6, 2018                 | May 7, 2018      |

*[Remainder of Page Intentionally Left Blank]*

<sup>1</sup> See Scheduling Order, ECF No. 19.

<sup>2</sup> Pursuant to the Scheduling Order, at ECF No. 19, if dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after the decision on the last such dispositive motion or further order of the Court.

1 This extension is reasonable and necessary given the good cause set forth  
2 above.

3 **IT IS SO STIPULATED.**

4 Dated: November 16, 2017

Dated: November 16, 2017

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THE BALL LAW GROUP

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By: /s/ Zachary T. Ball

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12 Dated: November 16, 2017

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Association*

**ORDER**

**IT IS SO ORDERED.**

23   
U.S. ~~DISTRICT~~ MAGISTRATE JUDGE

24 DATED: November 17, 2017