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 7 Avenue Trust

8
 9 UNITED STATES DISTRICT COURT
 10 DISTRICT OF NEVADA

11 PROF-2013-S3 LEGAL TITLE TRUST, BY
 12 U.S. BANK NATIONAL ASSOCIATION, AS
 LEGAL TITLE TRUSTEE,
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 Plaintiff,
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 vs.
 15 FLYING FROG AVENUE TRUST,
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 Defendant.

CASE NO.: 2:17-cv-01933-JCM-GWF

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 19 **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE**
 20 **(THIRD REQUEST)**

21 Defendant, Flying Frog Avenue Trust (hereinafter “Flying Frog” or “Defendant”), by and through
 22 its counsel of record, the Law Offices of Michael F. Bohn, Esq., Ltd., plaintiff, PROF-2013-S3 Legal
 23 Title Trust, by U.S. Bank National Association, as Legal Title Trustee (hereinafter “Plaintiff” or “U.S.
 24 Bank”), by and through its attorney, ROCK K. JUNG, ESQ., of the law firm of Wright, Finlay & Zak,
 25 LLP, and Defendant Red Rock Financial Services, LLC (hereinafter “RRFS”), by and through its counsel
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1 of record, Steve Scow, Esq. of Koch & Scow, LLC, and hereby stipulate and agree to extend discovery
2 and dispositive motion deadlines.

3 **A. DISCOVERY COMPLETED**

4 1. Plaintiffs' Initial and First Supplemental Disclosures.

5 2. Plaintiff's Subpoena Duces Tecum to Venezia Community Association and Red Rock
6 Financial Services.

7 3. Plaintiffs' written discovery (interrogatories, requests for production and requests for
8 admission) to Flying Frog Avenue Trust.

9 4. Defendant Flying Frog Avenue Trust's Initial Disclosures.

10 5. Flying Frog Avenue Trust's responses to Plaintiffs' written discovery (requests for
11 production, requests for admission, interrogatories).

12 6. Plaintiff's Expert Disclosure

13 7. Plaintiff's written discovery (interrogatories, requests for production and requests for
14 admission) to Red Rock Financial Services, LLC.

15 8. Red Rock Financial Services, LLC's Initial Disclosures.

16 9. Red Rock Financial Services, LLC's responses to Plaintiffs' written discovery (requests
17 for production, requests for admission, interrogatories).

18 10. Flying Frog Avenue Trust's written discovery (interrogatories, requests for production and
19 requests for admission) to Plaintiff.

20 11. Plaintiff's responses to Flying Frog Avenue Trust's written discovery (interrogatories,
21 requests for production and requests for admission).

22 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

23 1. Plaintiff's Supplemental responses to Flying Frog Avenue Trust's written discovery
24 (interrogatories and requests for production).

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1 **C. REASON WHY DISCOVERY HAS NOT BEEN COMPLETED**

2 Good cause and excusable neglect justify an extension of the deadlines at this time. Defendant,
3 Flying Frog Avenue Trust, has requested that Plaintiff supplement its responses to their discovery
4 requests. Plaintiff agreed to supplement the written discovery and has been working with defendant
5 Flying Frog Avenue Trust to address its concerns. Therefore, with the hope of completing discovery
6 without requiring court intervention, the parties are desirous to extend the dispositive motions deadline
7 at this time.

8 **D. PROPOSED PRE-TRIAL DEADLINES AND DISCOVERY SCHEDULE**

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EVENT	CURRENT DATE	PROPOSED DATE
Discovery Cut-Off	March 13, 2018	N/A
Motions to Amend Pleadings/Add Parties	November 6, 2017	N/A
Expert Disclosures	December 6, 2017	N/A
Rebuttal Expert Disclosures	January 5, 2018	N/A
Dispositive Motions	May 14, 2018	May 29, 2018
Joint Pre-Trial Order	June 4, 2018	June 19, 2018

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17 **E. CURRENT TRIAL DATE**

18 A trial date is not currently set for this matter.

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1 **F. CONCLUSION**

2 Accordingly, for good cause shown, excusable neglect, and the joint work of the parties to
3 conclude discovery amicably the parties respectfully request that the Court enter the accompanying order
4 to extend the aforementioned dispositive motions deadline in this matter.

5 IT IS SO STIPULATED.

6 DATED this 10th day of May, 2018.

7 **WRIGHT, FINLAY & ZAK, LLP**

8 /s/ Rock K. Jung, Esq.
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Title Trust, U.S. Bank National Association,
14 as Legal Title Trustee

15 **KOCH & SCOW LLC**

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Attorneys for defendant
20 Red Rock Financial Services

21
22 **IT IS SO ORDERED.**

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ORDER



UNITED STATES MAGISTRATE JUDGE

DATED: 5-11-2018

1 Respectfully submitted by:

2 LAW OFFICES OF
3 MICHAEL F. BOHN, ESQ., LTD.

4 By: /s/ Michael F. Bohn, Esq.
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