

1 ZIEVE, BRODNAX & STEELE, LLP
 2 Shadd A. Wade, Esq.
 3 Nevada Bar 11310
 4 3753 Howard Hughes Parkway, Suite 200
 5 Las Vegas, Nevada 89169
 6 Tel: (702) 948-8565
 7 Fax: (702) 446-9898
 8 swade@zbslaw.com

9 Attorneys for plaintiff The Bank of New York Mellon FKA The Bank of New York, As Trustee
 10 for the Certificateholders of the CWABS Inc., Asset-Backed Certificates, Series 2006-12

11 **UNITED STATES DISTRICT COURT**
 12 **FOR THE DISTRICT OF NEVADA**

13 THE BANK OF NEW YORK MELLON
 14 FKA THE BANK OF NEW YORK, AS
 15 TRUSTEE FOR THE
 16 CERTIFICATEHOLDERS OF THE
 17 CWABS INC., ASSET-BACKED
 18 CERTIFICATES, SERIES 2006-12, a
 19 national bank,

20 Plaintiff,

21 vs.

22 DAY SPRING PROPERTY OWNERS
 23 ASSOCIATION, a Nevada non-profit
 24 corporation,

25 Defendant.

26 **CASE NO.: 2:17-CV-01992-JCM-GWF**

27 **STIPULATION TO EXTEND TIME TO**
 28 **RESPOND TO DEFENDANT’S**
MOTION TO DISMISS [ECF NO. 11]

FIRST REQUESTED EXTENSION

Plaintiff The Bank of New York Mellon FKA The Bank of New York, As Trustee for the Certificateholders of the CWABS Inc., Asset-Backed Certificates, Series 2006-12 (“BNYM”) by and through Shadd A. Wade, Esq. of the law firm Zieve, Brodnax & Steele, LLP, and Defendant DAY SPRING PROPERTY OWNERS ASSOCIATION, (“Defendant”) by and through Eric N. Tran, Esq. of the law firm Lipson, Neilson, Cole, Seltzer & Garin, P.C., hereby agree and stipulate as follows:

Defendant’s Motion to Dismiss was filed on January 25, 2018 at ECF No. 11. The deadline for Plaintiff to file their response was February 8, 2018.

1 IT IS STIPULATED AND AGREED that the time to respond to Defendant's Motion to
2 Dismiss be extended by 30 days, making the filing due date for a response March 10, 2018.

3 This is the first stipulation for extension of time to file a response to Defendant's Motion
4 to Dismiss. Plaintiff requests the additional time to explore settlement of the case with
5 Defendant's newly-retained counsel.

6 Dated: February 8, 2018

Dated: February 8, 2018

7 ZIEVE, BRODNAX & STEELE, LLP

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

9 By: /s/Shadd A. Wade, Esq.

By: /s/Eric Tran, Esq.

10 Shadd A. Wade, Esq.

Eric N. Tran, Esq.

11 Nevada Bar No. 11310

Nevada Bar No. 11876

12 J. Stephen Dolembro, Esq.

9900 Covington Cross Drive, Suite 120

13 Nevada Bar 9795

Las Vegas, Nevada 89144

14 swade@zbslaw.com

Attorney for Defendant, Day Spring


15 sdolembro@zbslaw.com

Property Owners Association

16 *Attorneys for Plaintiff The Bank of New
17 York Mellon*

18 **ORDER**

19 IT IS SO ORDERED February 21, 2018.

20 
UNITED STATES DISTRICT JUDGE

21 Respectfully submitted:

22 ZIEVE, BRODNAX & STEELE, LLP

23 By: Shadd A. Wade

24 Shadd A. Wade, Esq.

25 Nevada Bar 11310

26 swade@zbslaw.com

27 *Attorneys for Plaintiff The Bank of New York Mellon fka The Bank of New York, as Trustee for
28 the Certificateholders of the CWABS, Inc. Asset-backed Certificates, Series 2006-13*

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

CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b) and Electronic Filing Procedure IV(B), I certify that on the 16th day of February, 2018 a true and correct copy of the **STIPULATION TO EXTEND TIME TO RESPOND TO DEFENDANT’S MOTION TO DISMISS [ECF NO. 11]** was transmitted electronically through the Court’s e-filing electronic system to the attorney(s) associated with this case.

Eric N. Tran, Esq.
LIPSON NEILSON, P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
Attorney for Defendant

/s/Sara Aslinger
An Employee of ZIEVE, BRODNAX & STEELE, LLP