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7 Attorneys for Mortgage Fund IVC Trust 2016-RN5

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

11 MORTGAGE FUND IVC TRUST 2016-RN5,

Case No. 2:17-cv-02309-KJD-BNW

12 Plaintiff,

13 vs.

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME TO RESPOND TO  
 ORDER, ECF No. 51**

14 DEWEY D. BROWN; REPUBLIC SILVER  
 15 STATE DISPOSAL, INC. DBA REPUBLIC  
 16 SERVICES; LILLIAN R. BROWN; SATICOY  
 BAY LLC SERIES 2175 CLEARWATER  
 LAKE; DOE INDIVIDUALS I-X, inclusive, and  
 17 ROE CORPORATIONS I-X, inclusive,

**(FIRST REQUEST)**

18 Defendants.

19 Mortgage Fund IVC Trust 2016-RN5 (the **Trust**), and Saticoy Bay LLC Series 2175  
 20 Clearwater Lake (**Saticoy Bay**) hereby stipulate and agree to extend the Trust's deadline to move for  
 21 judgment on its judicial foreclosure claim or otherwise dispose of its remaining claim by two weeks,  
 22 to **February 20, 2020**. The Trust's current deadline to dispose of or otherwise provide a status report  
 23 to the court on its remaining claim, per the court's order at ECF No. 51, is February 6, 2020.

24 Plaintiff does not at this time intend to waive, drop, or dismiss the judicial foreclosure claim.  
 25 However, in recognition of the fact that an appeal on the quiet title component of the claim may  
 26 impact the outcome of the ability for plaintiff to obtain clear title through foreclosure, the parties are  
 27 engaging in discussion to determine if an agreement can be reached regarding how foreclosure  
 28 should be handled. Accordingly, the parties: (1) provide this stipulation as a status report; and (2)

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1 stipulate and agree that they will file a status report, stipulation, or other appropriate motion setting  
2 forth their agreement and/or respective positions by February 20, 2020.

3 This is the parties' first request for an extension of this deadline and is not intended to cause  
4 any delay or prejudice to any party.

5 DATED this 5<sup>th</sup> day of February, 2020.

6 **AKERMAN LLP**

7  
8 /s/ Jamie K. Combs  
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**LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD.**

8 /s/ Michael F. Bohn  
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15 Attorneys for Saticoy Bay LLC Series 2175  
16 Clearwater Lake

17 **ORDER**

18 **IT IS SO ORDERED:**

19 

20 **UNITED STATES DISTRICT COURT JUDGE**

21 DATED: February 10, 2020  
22 \_\_\_\_\_