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7 *Attorneys for Defendants PHH Mortgage*  
*Corporation, Wells Fargo Bank Minnesota,*  
8 *N.A. as Trustee for Merrill Lynch Mortgage*  
*Investors Trust, Series MLCC 2003-A, Merrill*  
9 *Lynch Mortgage Investors Trust, Series MLCC*  
*2003-A, and Michael Danlag*

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

13 JAMES SONG, an individual; ADRIENNE  
14 SONG, an individual,

15 Plaintiffs

16 vs.

17 MTC FINANCIAL INC. DBA TRUSTEE  
CORPS; WELLS FARGO BANK, N.A.,  
18 successor by merger to WELLS FARGO  
BANK MINNESOTA, N.A. AS TRUSTEE  
19 FOR MERRILL LYNCH MORTGAGE  
INVESTORS TRUST, SERIES MLCC 2003-  
20 A; MLCC 2003-A; BANK OF AMERICA,  
21 N.A.; PHH MORTGAGE CORPORATION;  
22 MICHAEL DANLAG, an individual; and  
DOES 1 through 10, inclusive, ROE  
23 CORPORATIONS 1 through 10, inclusive,

24 Defendants.

CASE NO: 2:18-cv-00757-JCM-  
PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE REPLY  
IN SUPPORT OF THE  
RENEWED MOTION TO  
DISMISS (ECF NO. 64)**

**(First Request)**

25  
26 Defendants PHH Mortgage Corporation (“PHH”), Wells Fargo Bank  
27 Minnesota, N.A. as Trustee for Merrill Lynch Mortgage Investors Trust, Series  
28 MLCC 2003-A, (“Wells Fargo”), Merrill Lynch Mortgage Investors Trust, Series

1 MLCC 2003-A (the “Trust”), and Michael Danlag (together, “Defendants”) and  
2 plaintiffs James and Adrienne Song, stipulate and agree that Defendants have up to  
3 and including September 30, 2020 to file a reply in support of the renewed motion to  
4 dismiss (ECF No. 64).

5 This is the first request for an extension, and it is made in good faith and not  
6 for purposes of delay. Counsel requests the extension due their schedule. Further, the  
7 Songs filed a counter motion (EFC No. 68), to which a response is due on September  
8 30, 2020. The extension will also consolidate deadlines and allow counsel for  
9 Defendants to address all arguments efficiently. Accordingly, the parties have  
10 requested a brief eight (8) day extension to file a reply in support of the renewed  
11 motion to dismiss.

12 DATED: September 18, 2020.

13 THE SCHNITZER LAW FIRM

BALLARD SPAHR LLP

14 By: /s/ Jordan P. Schnitzer  
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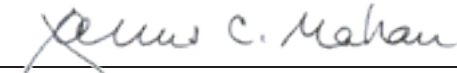
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*Attorneys for Plaintiffs*

*Attorneys for Defendants*

**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: September 21, 2020