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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 RICHARD ZEITLIN, ADVANCED
13 TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
14 RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
15 CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
16 DATA SERVICES,

17 Plaintiffs,

18 v.

19 BANK OF AMERICA, N.A., and JOHN and
20 JANE DOES 1-100,

21 Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO AND REPLY IN SUPPORT OF
PLAINTIFFS' MOTION TO AMEND
AND SUPPLEMENT COMPLAINT, ADD
A PARTY, AND MODIFY THE
SCHEDULING ORDER**

(FIRST REQUEST)

22 Pursuant to Local Rules IA 6-1, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced
23 Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American
24 Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified
25 Data Services (the "Plaintiffs") and Defendant Bank of America, N.A. ("BANA"), by and
26 through their respective undersigned counsel of record, submit this Stipulation and Proposed
27 Order for a 1-week extension of BANA's deadline to file its response to Plaintiffs' Motion to
28 Amend and Supplement Complaint, Add a Party, and Modify the Scheduling Order (ECF No.

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1 166) (the “Motion”). The Motion was filed on August 30, 2021 and is not set for hearing. The
2 Parties request an extension from September 13, 2021, BANA’s current deadline to respond, to
3 September 20, 2021.

4 The Parties also request that the deadline for Plaintiffs to file a reply in support of their
5 Motion be extended to October 7, 2021. Plaintiffs’ deadline to file a reply is currently seven days
6 after BANA files its response.

7 This is the Parties’ first request for an extension of the briefing deadlines for the Motion
8 and is not intended to cause any delay or prejudice to any party. The reason for the extension is to
9 give the Parties time to evaluate and respond to the arguments set forth in the Motion and
10 BANA’s response to the Motion.

11 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
12 for BANA to file their response to the Motion is extended to and through September 20, 2021 and
13 the time for Plaintiffs to file their reply in support of the Motion is extended to and through
14 October 7, 2021.

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IT IS SO STIPULATED.

Dated: September 8, 2021

Dated: September 8, 2021

THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

/s/ Daniel James Treuden

/s/ Holly E. Cheong

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Attorneys for Plaintiffs

Order

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: September 9, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO AND REPLY IN SUPPORT OF PLAINTIFFS’ MOTION TO AMEND AND SUPPLEMENT COMPLAINT, ADD A PARTY, AND MODIFY THE SCHEDULING ORDER (FIRST REQUEST)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court’s CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: September 8, 2021

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

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