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9 Attorneys for Plaintiff

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

11
 12 RICHARD ZEITLIN, ADVANCED)
 TELEPHONY CONSULTANTS, MRZ)
 13 MANAGEMENT, LLC, DONOR)
 RELATIONS, LLC, TPFE, INC.,)
 14 AMERICAN TECHNOLOGY SERVICES,)
 COMPLIANCE CONSULTANTS,)
 15 CHROME BUILDERS CONSTRUCTION,)
 INC., and UNIFIED DATA SERVICES,)

16 Plaintiffs,)

17 v.)

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

20 Defendants.)

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

**JOINT STIPULATION TO EXTEND
 DEADLINE TO RESPOND TO
 DEFENDANT’S OBJECTION TO
 MAGISTRATE JUDGE’S ORDER [ECF
 NO. 192]
 (First Request)**

21 Pursuant to Local Rules IA 6-1, IA 6-2, IA 7-1, and IB 3-1, Plaintiffs Richard Zeitlin,
 22 Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc.,
 23 American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified
 24 Data Services, (hereinafter the “Plaintiffs”), and the Defendant Bank of America (hereinafter
 25 “BOFA”), by and through their respective attorneys of record, hereby jointly stipulate to modestly
 26 extend the briefing schedule for the Plaintiffs to file a response to the Defendant’s Objection to the
 27 Magistrate Judge’s Order. (Docs. 192 and 200.) This is the first stipulation requesting an extension of
 28

1 time to extend the deadline to respond to the Defendant’s Objection. (Doc. 200.) Plaintiffs’ response
2 to Defendant’s Objection is currently due November 18, 2021 and this request seeks an extension to
3 December 1, 2021. In support thereof, the Plaintiffs and BOFA represent as follows:

4 The Plaintiffs require additional time because in addition to their response to BOFA’s
5 objections to this Court’s Rule 30(b)(6) Order, any objection to the Court’s Report and
6 Recommendation on Plaintiffs’ motion for leave to file a first amended complaint must also be filed
7 on November 18, 2021. (Docs. 166 and 203.) Additionally, a person in Atty. Bernhoft’s immediate
8 family will undergo surgery on November 17, 2021, and he will be unavailable for a period of time
9 before and after that surgery. For these reasons the Plaintiffs require an extension of time to file their
10 response to BOFA’s objections to this Court’s Rule 30(b)(6) order.

11 Plaintiffs’ counsel contacted BOFA’s counsel and discussed extending the briefing deadline.
12 Based on those discussions, the Parties stipulate to an extended deadline for Plaintiffs to respond to
13 BOFA’s Objection to the Magistrate Judge’s Order to December 1, 2021. (Doc. 200.) The Parties
14 agree that the foregoing constitutes good cause to extend the briefing schedule deadlines.

15 **IT IS SO STIPULATED.**

16 Dated: November 9, 2021
17 THE BERNHOFT LAW FIRM, S.C.

Dated: November 9, 2021
SNELL & WILMER, L.L.P.

18 /s/ Daniel J. Treuden
19 Daniel J. Treuden, Esq.
20 Wisconsin Bar No. 1052766
21 1402 E. Cesar Chavez Street
Austin, Texas 78702

/s/ Holly E. Cheong
Amy F. Sorenson (NV Bar 12495)
Blakeley E. Griffith, Esq. (NV Bar 12386)
Holly E. Cheong (NV Bar 11936)
3883 Howard Hughes Pkwy, Ste. 1100
Las Vegas, Nevada 89169

22 Attorney for Plaintiffs
23 Appearing *pro hac vice*

Attorneys for Bank of America, N.A.

24 **IT IS SO ORDERED:**

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26 RICHARD F. BOULWARE, II
27 United States District Judge
28 DATED this 16th day of November, 2021.

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IT IS SO ORDERED:

UNITED STATES DISTRICT COURT JUDGE

Dated: _____

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Certificate of Service

I hereby certify that on November 9, 2021, I electronically filed and served the foregoing second JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT’S OBJECTION TO MAGISTRATE JUDGE’S ORDER [ECF NO. 192] with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Daniel J. Treuden
Daniel J. Treuden
Attorney for Plaintiffs