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9 *Attorneys for Defendant Bank of America, N.A.*

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' REFILED SECOND
MOTION TO COMPEL DISCOVERY
AND FOR SANCTIONS**

(FOURTH 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 8-day extension of BANA's deadline to file its response to Plaintiffs' Refiled Second
28 Motion to Compel Discovery and For Sanctions (ECF No. 195) (the "Motion"). The Motion was

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1 filed on October 25, 2021, under seal, and is set for hearing on January 6, 2022. The Parties
2 request an extension from November 22, 2021, BANA’s current deadline to respond, to
3 November 30, 2021. This is the Parties’ fourth request for an extension of the briefing deadlines
4 for the Motion.

5 The Parties also request that the deadline for Plaintiffs to file a reply in support of their
6 Motion be extended to December 15, 2021. Plaintiffs’ current deadline to file a reply is
7 December 6, 2021.

8 This request for an extension is not intended to cause any delay or prejudice to any party.
9 The reason for the extension is to give the counsel time to evaluate and respond to the arguments
10 set forth in the Motion and BANA’s response to the Motion in light of certain unavoidable and
11 largely unexpected personal scheduling conflicts, and to account for the intervening Thanksgiving
12 holiday.

13 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
14 for BANA to file their response to the Motion is extended to and through November 30, 2021 and
15 the time for Plaintiffs to file their reply in support of the Motion is extended to and through
16 December 15, 2021.

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IT IS SO STIPULATED.

Dated: November 17, 2021

Dated: November 17, 2021

THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

/s/ Daniel J. Treuden
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Attorneys for Plaintiffs

IT IS SO ORDERED.



RICHARD E. BOULWARE, II

United States District Court

DATED this 17th day of November, 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’ REFILED SECOND MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS (FOURTH 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: November 17, 2021

/s/ Jeanne Forrest
An Employee of Snell & Wilmer L.L.P.

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