

1 **ROBERT G. BERNHOFT, ESQ**  
 Wisconsin Bar No. 1032777  
 2 **THE BERNHOFT LAW FIRM, S.C.**  
 1402 E. Cesar Chavez Street  
 3 Austin, Texas 78702  
 (512) 582-2100 telephone  
 4 (512) 373-3159 facsimile  
 djtreuden@bernhofflaw.com

5 **JOEL F. HANSEN, ESQ.**  
 Nevada Bar No. 1876  
 6 **HANSEN & HANSEN, LLC**  
 9030 W. Cheyenne Avenue, #210  
 7 (702) 906-1300 office  
 8 (702) 366-1857: facsimile  
 efile@hansenlawyers.com

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]  
 (Sixth Request)**

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

1 respond to the Defendant’s Objection. (Doc. 200.) Plaintiffs’ response to Defendant’s Objection was  
2 originally due November 18, 2021. Prior stipulations extended the deadline to December 1, 2021, then  
3 to December 6, 2021, then to December 15, 2021, then to December 30, 2021, and a current due date  
4 of January 11, 2022. (Docs. 211, 217, 227, 230, and 242.) This request seeks an extension to January  
5 25, 2022. In support thereof, the Plaintiffs and BOFA represent as follows:

6 This stipulation for an extension is not intended to cause undue delay. Every attorney and  
7 paralegal at the Bernhoft Law Firm save one has now fallen ill with either the flu or COVID-19 over  
8 the past two weeks, and the Firm’s offices were closed last week. Attorney Bernhoft (undersigned  
9 Plaintiffs’ counsel) is lead drafter on this response brief. He fell ill over the New Year’s weekend and  
10 is still being treated for both flu and COVID-19. For these reasons, the Plaintiffs require an extension  
11 of time to file their response to BOFA’s objections to this Court’s Rule 30(b)(6) order.

12 Plaintiffs’ counsel contacted BOFA’s counsel and discussed extending the briefing deadline.  
13 Based on those discussions, the Parties stipulate to extend the deadline for Plaintiffs to respond to  
14 BOFA’s Objection to the Magistrate Judge’s Order to January 25, 2022. The Parties agree that the  
15 foregoing constitutes good cause to extend the briefing schedule deadlines.

16 **IT IS SO STIPULATED.**

17 Dated: January 10, 2022  
18 THE BERNHOFT LAW FIRM, S.C.

Dated: January 10, 2022  
SNELL & WILMER, L.L.P.

19 /s/ Robert G. Bernhoft  
20 Robert G. Bernhoft, Esq.  
21 Wisconsin Bar No. 1032777  
22 1402 E. Cesar Chavez Street  
Austin, Texas 78702

/s/ Blakeley E. Griffith  
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

23 Attorney for Plaintiffs  
24 Appearing *pro hac vice*

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

25 IT IS SO ORDERED:

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27 RICHARD F. BOULWARE, II  
28 United States District Judge

DATED this 11th day of January, 2022.

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IT IS SO ORDERED:

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UNITED STATES DISTRICT COURT JUDGE

Dated: \_\_\_\_\_

**Certificate of Service**

I hereby certify that on January 10, 2022, I electronically filed and served the foregoing third 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/ Robert G. Bernhoft  
Robert G. Bernhoft  
Attorney for Plaintiffs

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