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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DOLLIE MCDONALD,

Case No.: 2:21-cv-01892-GMN-BNW

11 Plaintiff,

DISTRICT OF NEVADA

13 VS.

**MOTION TO EXTEND DEADLINE TO
RESPOND TO FIRST AMENDED
COMPLAINT**

(First Request)

PAUL M. DONOFRIO, individually and in his official capacity, and BANK OF AMERICA, as Successor in interest to COUNTRYWIDE HOME LOANS, INC. and COUNTRYWIDE BANK, FSB, BAC HOME LOANS SERVICING, LP FKA COUNTRYWIDE HOME LOANS SERVICING, LP

Defendants.

Defendants Paul M. Donofrio and Bank of America, N.A. (“Defendants”), by and through their undersigned attorneys of record, hereby submit the instant Motion to Extend Deadline to Respond to First Amended Complaint. This is the first request for an extension of time. Defendants respectfully submits that good cause exists for a short four-day extension to the respond the First Amended Complaint through January 20, 2023.

27 On December 19, 2022, Defendants and Plaintiff Dollie McDonald (“Plaintiff”) entered
28 into a Stipulation for Leave to File First Amended Complaint with Response Deadline. (ECF No.

1 34). The stipulation provided for a response deadline of January 16, 2023. The Court approved
 2 and entered an Order on this stipulation on December 20, 2022. (ECF No. 35).

3 Due to an oversight by undersigned Defendants' counsel, the January 16 deadline falls on
 4 the Martin Luther King, Jr. holiday. This Court and Defendants' counsel's firm is closed in
 5 observance of this holiday.

6 In addition, undersigned Defendants' counsel has experienced some unexpected
 7 interruptions with his work schedule over the last two weeks. Defendants' counsel had a death in
 8 the family causing unexpected travel to Oregon the week of December 26. In addition,
 9 Defendants' counsel's entire household came down with the flu that caused interruptions with his
 10 work schedule the week of January 2. Defendants' counsel has been catching up on matters from
 11 these unexpected interruptions.

12 On January 12, 2023, Defendants' counsel sent Plaintiff e-mail correspondence requesting
 13 an extension through January 20, 2023, in light of these circumstances. Defendants' counsel has
 14 not yet received a response to this request and is filing this motion before the January 16 holiday
 15 in an abundance of caution.

16 Based upon the foregoing, Defendants respectfully request that the Court grant an
 17 extension to respond to the First Amended Complaint through January 20, 2023, which is a short
 18 four-day extension. This extension is being requested in good faith and is not for purposes of delay
 19 or prejudice to any other party.

20 DATED this 13th day of January, 2023.

21 WRIGHT, FINLAY & ZAK, LLP

22 /s/ Jory C. Garabedian

23 Jory C. Garabedian, Esq.

24 Nevada Bar No. 10352

25 7785 W. Sahara Avenue, Suite 200

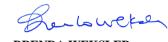
26 Las Vegas, NV 89117

27 *Attorneys for Defendant, Paul M. Donofrio & Bank
 28 of America, N.A.*

ORDER

27 For good cause shown, IT IS ORDERED that ECF No. 37
 28 is GRANTED.

IT IS SO ORDERED
 DATED: 5:01 pm, January 17, 2023


 29 BRENDA WEKSLER
 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

2 Pursuant to Fed. R. Civ. P. 5(b) and Electronic Filing Procedure IV(B), I certify that on
3 13th day of January, 2023, a true and correct copy of the **MOTION TO EXTEND DEADLINE**
4 **TO RESPOND TO FIRST AMENDED COMPLAINT (First Request)** was transmitted
5 electronically through the Court's e-filing electronic system to the attorney(s) associated with this
6 case, addressed as follows:

7 | Dollie McDonald dollieinvegas@yahoo.com

/s/ Erica Baker

An Employee of WRIGHT, FINLAY & ZAK, LLP