

1 MELANIE D. MORGAN, ESQ.
2 Nevada Bar No. 8215
3 SCOTT R. LACHMAN, ESQ.
4 Nevada Bar No. 12016
5 AKERMAN LLP
6 1635 Village Center Circle, Suite 200
7 Las Vegas, Nevada 89134
8 Telephone: (702) 634-5000
9 Facsimile: (702) 380-8572
10 Email: melanie.morgan@akerman.com
11 Email: scott.lachman@akerman.com

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

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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 SILVER CREEK CAPITAL, LLC, a Nevada
18 limited liability company,

19 Case No. 2:22-cv-01515-JCM-EJY

20 Plaintiff,

21 v.

22 NATIONAL DEFAULT SERVICING
23 CORPORATION, an Arizona corporation;
24 BANK OF AMERICA, N.A., a national banking
25 association; DOES I through X; and ROE
26 BUSINESS ENTITIES I through X, inclusive,

27 **STIPULATION AND ORDER FOR**
28 **EXTENSION OF TIME TO RESPOND TO**
29 **COMPLAINT**

30 **(FIRST REQUEST)**

31 Defendants.

32 Plaintiff Silver Creek Capital, LLC and defendant Bank of America, N.A. (**BANA**) stipulate
33 as follows:

- 34 1. BANA removed this case on September 12, 2022.
35 2. BANA's response to the complaint is due September 19, 2022.
36 2. Golden Creek intends to file a motion to remand in the coming weeks.
37 3. BANA shall have until ten (10) days after the court makes a decision on jurisdiction
38 to file its responsive pleading to the complaint.

39 ...

1 Good cause exists to grant the requested extension. BANA is requesting additional time to
 2 not waste time and resources while it waits for this court's decision on jurisdiction. BANA prefers to
 3 file one responsive pleading—either in federal or state court, depending on the court's decision.

4 This is the parties' first request for an extension of this deadline, and is not intended to cause
 5 any delay or prejudice to any party.

6 DATED this 15th day of September, 2022.

<p>AKERMAN LLP</p> <p><u>/s/ Scott Lachman</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134</p> <p><i>Attorneys for Bank of America, N.A.</i></p>	<p>HONG & HONG LAW OFFICE</p> <p><u>/s/ Joseph Y. Hong</u> JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Plaza Drive, Suite 650 Las Vegas, NV 89135</p> <p><i>Attorney for Silver Creek Capital, LLC</i></p>
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14 IT IS SO ORDERED.

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 16 UNITED STATES MAGISTRATE JUDGE

17 DATED: September 15, 2022