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Attorneys for Defendant Wells Fargo Bank, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AIRMOTIVE INVESTMENTS, LLC, a Nevada limited liability company,

Plaintiff,

V.

WELLS FARGO BANK, N.A.; a national banking association; DOE individuals I through XX; and ROW CORPORATIONS I through XX,

Defendants.

Case No. 2:25-cv-00239-APG-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR WELLS
FARGO BANK, N.A. TO RESPOND TO
COMPLAINT**

[SECOND REQUEST]

THIS STIPULATION is entered into by and between Plaintiff Airmotive Investments LLC (“Airmotive”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”, and together with Airmotive, the “Parties”), by and through undersigned counsel, to extend Wells Fargo’s deadline to respond to Airmotive’s Complaint from March 28, 2025 to April 18, 2025 based on the following:

1. On January 9, 2025, Airmotive served Wells Fargo with the Summons and Complaint.

2. On February 4, 2025, Wells Fargo timely removed the Complaint to this Court.

[ECF No. 1.]

1 3. Based on the date of removal, Wells Fargo's initial deadline to respond to the
2 Complaint is February 11, 2025.

3 4. On February 7, 2025, the Parties stipulated, and the Court ordered, an extended
4 deadline for Wells Fargo to respond to the Complaint, up to and including March 28, 2025. [ECF
5 No. 6, 7.]

6 5. The Parties continue actively engaging in early resolution discussions. To allow the
7 Parties to reach a resolution that may fully resolve the litigation prior to incurring unnecessary legal
8 fees, the Parties seek an additional extension of time for Wells Fargo to respond to the Complaint.

9 NOW THEREFORE, based on the foregoing and subject to Court approval, the Parties
10 agree as follows:

11 1. The Parties stipulate and agree to extend the deadline for Wells Fargo to respond to
12 the Complaint, up to and including **April 18, 2025**, to allow the Parties additional time to develop
13 early resolution discussions prior to incurring unnecessary legal fees.

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1 2. This extension request is sought in good faith and is not made for the purpose of
2 delay.

3 **IT IS SO STIPULATED.**

4 Dated: March 11, 2025.

5 Dated: March 11, 2025.

6 ROGER CROTEAU & ASSOC., LTD.

7 SNELL & WILMER L.L.P.

8 By: /s/ Timothy E. Rhoda
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14 Investments, LLC*

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21 *Attorneys for Defendant Wells Fargo
22 Bank, N.A.*

23 **IT IS SO ORDERED.**

24 
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: March 11, 2025

27 Respectfully submitted by:

28 SNELL & WILMER L.L.P.

29 By: /s/ Jennifer B. Lustig
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