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as Trustee for NAAC 2006-AR3*

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

XAVIER AND JOHN'S REAL ESTATE  
AND INVESTMENTS SERIES LLC 6, a  
Nevada limited liability company,

**Plaintiff,**

V.

HSBC BANK USA AS TRUSTEE FOR  
NAAC 2006-AR3; a national banking  
association; DOES I through X; and ROE  
BUSINESS ENTITIES I through X, inclusive,

## Defendants.

Case No. 2:25-cv-00277-BNW

**STIPULATION AND ORDER TO  
EXTEND BRIEFING DEADLINES ON  
PLAINTIFF'S MOTION TO REMAND  
TO STATE COURT AND FOR  
ATTORNEY'S FEES AND COSTS  
UNDER 28 U.S.C. 1447(C)**

[ECF Nos. 10, 11]

**(First Request)**

THIS STIPULATION is entered into by and between Plaintiff Xavier and John's Real Estate and Investments Series LLC 6 ("Xavier and John's") and Defendant HSBC Bank USA ("HSBC", and together with Xavier and John's, the "Parties"), by and through undersigned counsel, to extend the deadline to file the Motion to Remand deadline from March 5, 2025 to March 19, 2025 based on the following:

1. On February 19, 2025, Xavier and John's filed a Motion to Remand ("Remand Motion") [ECF No. 10] and a Motion For Attorney's Fees and Costs Under 28 U.S.C. 1447(c) ("Fees Motion") [ECF No. 11.]

1           2. HSBC's current deadline to respond to the Remand Motion and the Fees Motion is  
2 March 5, 2025.

3           3. The Parties are actively engaging in early resolution discussions. To allow early  
4 resolution discussions to develop prior to incurring unnecessary legal fees, the Parties seek an  
5 extension of time for HSBC to respond to the Remand Motion and the Fees Motion.

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

8           1. The Parties stipulate and agree to extend the deadline for HSBC to respond to the  
9 Remand Motion and the Fees Motion, up to and including **March 19, 2025**.

10          2. The Parties further stipulate and agree to extend the deadline for Xavier and John's  
11 to file its reply in support of the Remand Motion and the Fees Motion, up to and including **March**  
12 **26, 2025**.

13          3. This extension request is sought in good faith and is not made for the purpose of  
14 delay.

15          **IT IS SO STIPULATED.**

16          Dated: March 3, 2025.

17          Dated: March 3, 2025.

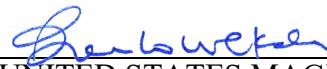
18          HONG & HONG LAW OFFICE

19          SNELL & WILMER L.L.P.

20          By: /s/ Joseph Y. Hong  
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22          Attorneys for Plaintiff Xavier and John's  
Real Estate and Investments Series LLC 6

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Las Vegas, Nevada 89135  
25          Attorneys for Defendant HSBC Bank USA

26          **IT IS SO ORDERED.**

27            
28          UNITED STATES MAGISTRATE JUDGE

29          DATED: 3/5/2025

1 Respectfully submitted by:  
2 SNELL & WILMER L.L.P.  
3 By: /s/ Jennifer B. Lustig  
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