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*Attorneys for Defendant HSBC Bank USA
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.]

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

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

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

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

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

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

IT IS SO STIPULATED.

Dated: March 3, 2025.

Dated: March 3, 2025.

HONG & HONG LAW OFFICE

SNELL & WILMER L.L.P.

By: /s/ Joseph Y. Hong

By: /s/ Jennifer B. Lustig

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 3/5/2025

1 Respectfully submitted by:

2 SNELL & WILMER L.L.P.

3 By: /s/ Jennifer B. Lustig

4 Kelly H. Dove, Esq.

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8 *Attorneys for Defendant HSBC Bank USA*