1 2 3 4 5 5 6 6 7 7 8 8 9 9 10 11 12 12 13 14 14 15 15 15 15 16 17 17 17 18 18 19 19 20 21 22 22 23 24 25 26 27 28 28 26 27 28 28 26 27 28 28 28 28 28 28 28 28 28 28 28 28 28		OF NEVADA  Case No. 3:13-cv-00503-LRH-WGC  STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE  (FIRST REQUEST)
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Pursuant to Fed. R. Civ. P. 26(f), and Local Rules 6-1, 26-1 and 26-4, Pursuant to Local Rule 7-1, it is hereby stipulated by and between Wells Fargo Bank, N.A. ("Wells Fargo") and Federal Home Loan Mortgage Corporation ("Freddie Mac") together with LVDG Series 125, established under LVDG LLC ("LVDG" and jointly with Wells Fargo, and Freddie Mac the "Parties") by and through their respective undersigned counsel of record, submit this Stipulation and Proposed Order to extend the dispositive motion deadline in this action. This is the Parties' first request for extension of the dispositive motion deadline. The current dispositive motion deadline is September 7, 2018, and the Stipulating Parties are seeking a forty-five day extension until October 22, 2018. Discovery closed on August 7, 2018, and the Parties are not seeking to extend discovery.

This request to extend the dispositive motion deadline is made in good faith, and is not for purpose of delay or prejudice to any party, but to allow all parties to have enough time to brief their dispositive motions, especially given the recent state and federal appellate-court decisions which will impact the briefing in this case. Additionally, the Parties are continuing to consider possible settlement and have been engaged in settlement negotiations.

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The requested extension will not result in undue delay or prejudice to any party and will serve to potentially minimize the expense to the Parties and to the Court if settlement is reached and if additional briefing is avoided. DATED this 4th day of September, 2018. DATED this 4th day of September, 2018. SNELL & WILMER L.L.P. ROGER P. CROTEAU & ASSOCIATES /s/ Wayne Klomp /s/ Timothy E. Rhoda Andrew Jacobs, Esq. Roger P. Croteau, Esq. Nevada Bar No. 12787 Nevada Bar No. 4958 Wayne Klomp, Esq. Timothy E. Rhoda, Esq. Nevada Bar No. 10109 Nevada Bar No. 7878 50 West Liberty Street, Suite 510 9120 West Post Rd, Suite 100 Reno, Nevada 89501 Las Vegas, NV 89148 Attorneys for Wells Fargo Bank, N.A. and Attorneys for LVDG Federal Home Loan Mortgage Corporation **ORDER** IT IS SO ORDERED. William G. Cobb UNITED STATES MAGISTRATE JUDGE September 4, 2018 DATED: