

1 Nathan Kanute, Esq.
Nevada Bar No. 12413
2 Erica Stutman, Esq.
Nevada Bar No. 10794
3 SNELL & WILMER L.L.P.
50 W. Liberty Street, Ste. 510
4 Reno, NV 89501-1961
Telephone: (775) 785-5440
5 Facsimile: (775) 785-5441
Email: estutman@swlaw.com
6 nkanute@swlaw.com

7 *Attorneys for HSBC BANK USA, N.A.*

8
9 IN THE UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 MATT P. JACOBSEN,

12 Plaintiff,

13 vs.

14 CLEAR RECON CORP, HSBC BANK
15 USA N.A., PHH MORTGAGE
CORPORATION,

16 Defendants.

CASE NO. 3:15-cv-00504-MMD-VPC

**HSBC BANK USA, N.A.'S REQUEST
FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION
FOR TEMPORARY RESTRAINING
ORDER (FIRST REQUEST)**

***EXPEDITED CONSIDERATION
REQUESTED***

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18 Defendant HSBC Bank USA, N.A. ("HSBC Bank") received Plaintiff's Ex Parte
19 Application for Temporary Restraining Order (the "TRO Motion") on the afternoon of Monday,
20 October 5, 2015. In the TRO Motion, Plaintiff seeks to enjoin a trustee's sale of his property
21 scheduled for Thursday, October 8, 2015. The Court ordered defendants to respond to the TRO
22 Motion by Wednesday, October 7, 2015, which is the day before the scheduled sale. To
23 adequately respond to the TRO Motion, HSBC Bank requires more time to consider Plaintiff's
24 allegations and ascertain the status of any pending request for loan modification. So that Plaintiff
25 will not be prejudiced by this requested extension, HSBC Bank has advised the trustee, Clear
26 Recon Corp., through its counsel, to postpone the sale for at least two weeks – to a date no sooner
27 than October 22, 2015.
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In light of the sale postponement, HSBC Bank requests that its deadline to respond to the TRO Motion be extended until Friday, October 16, 2015. The undersigned spoke to plaintiff by telephone for his position on this requested extension to respond, and he does not oppose this requested extension.

A proposed order is submitted concurrently with this motion.

Dated: October 7, 2015

SNELL & WILMER L.L.P.

By: /s/ Nathan G. Kanute
Erica J. Stutman
Nevada Bar No. 10794
Nathan Kanute
Nevada Bar No. 12413
SNELL & WILMER L.L.P.
50 W. Liberty Street, Ste. 510
Reno, NV 89501-1961
Telephone: (775) 785-5440
Facsimile: (775) 785-5441

Attorneys for HSBC BANK USA, N.A.

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I electronically filed the foregoing **HSBC BANK USA, N.A.’S REQUEST FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S MOTION FOR TEMPORARY RESTRAINING ORDER (FIRST REQUEST)** using the CM/ECF system which will send a notice of electronic filing to all parties as listed on the Notice of Electronic Filing.

I also caused to be served a true and correct copy of **HSBC BANK USA, N.A.’S REQUEST FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S MOTION FOR TEMPORARY RESTRAINING ORDER (FIRST REQUEST)** by the method indicated:

- Electronic Mail
- U.S. Certified Mail
- Facsimile Transmission
- Overnight Mail

and addressed to the following:

Matt P. Jacobsen
1311 La Loma Drive
Carson City, NV 89701
mj@annllc.com
Plaintiff in Pro Per

DATED October 7, 2015

/s/ Lara J. Taylor
An Employee of Snell & Wilmer LLP

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1 Nathan Kanute, Esq.
Nevada Bar No. 12413
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9 IN THE UNITED STATES DISTRICT COURT
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11 MATT P. JACOBSEN,

12 Plaintiff,

13 vs.

14 CLEAR RECON CORP, HSBC BANK
15 USA N.A., PHH MORTGAGE
CORPORATION,

16 Defendants.

CASE NO. 3:15-cv-00504-MMD-VPC

**ORDER GRANTING HSBC BANK USA,
N.A.’S REQUEST FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFF’S
MOTION FOR TEMPORARY
RESTRAINING ORDER (FIRST
REQUEST)**

17 This matter having come before the Court pursuant to Defendant HSBC Bank USA,
18 N.A.’s (“HSBC Bank”) Request for Extension of Time to Respond to Plaintiff’s Motion for
19 Temporary Restraining Order (First Request) filed on October 7, 2015; the Court having
20 previously ordered HSBC Bank to respond to Plaintiff’s Ex Parte Application for Temporary
21 Restraining Order (the “TRO Motion”) by Wednesday, October 7, 2015; HSBC Bank requiring
22 more time to adequately respond to the TRO Motion; Plaintiff not being prejudiced by the
23 requested extension; and good cause appearing to grant the extension:

24 IT IS HEREBY ORDERED that:

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1. HSBC Bank’s Request for Extension of Time to Respond to Plaintiff’s Motion for Temporary Restraining Order (First Request) is hereby GRANTED.

2. HSBC Bank shall have until Friday, October 16, 2015 to file its response to the TRO Motion.

IT IS SO ORDERED

Dated this 7th day of October 2015.



UNITED STATES DISTRICT COURT JUDGE