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6 *Attorney for Defendants*
THUNDER PROPERTIES, INC.
7 **AND LVDG, LLC [SERIES 200]**

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 ***

11 BANK OF AMERICA, N.A.,)

12 Plaintiff,)

Case No. 3:16-cv-00127-HDM-WGC

13 vs.)

14 SIERRA CEDARS CONDOMINIUM)
HOMEOWNERS ASSOCIATION; LVDG)
15 SERIES 200, LLC; THUNDER PROPERTIES,)
INC., HAMPTON & HAMPTON)
16 COLLECTIONS, LLC,)

17 Defendants.)
18 _____)

19 **STIPULATION AND ORDER TO EXTEND TIME TO**
RESPOND TO MOTION FOR SUMMARY JUDGMENT
20 **(Second Request)**

21 COMES NOW Plaintiff, BANK OF AMERICA, N.A., and Defendants, THUNDER
22 PROPERTIES, INC. and LVDG, LLC [SERIES 200]; SIERRA CEDARS CONDOMINIUM
23 HOMEOWNERS ASSOCIATION; and HAMPTON & HAMPTON COLLECTIONS, LLC, by
24 and through their undersigned counsel, and hereby stipulate and agree as follows:

- 25 1. On March 21, 2018, Plaintiff filed a Motion for Summary Judgment herein [ECF
#55].
26 2. On April 9, 2018, the parties submitted a stipulation extending the deadline to
27 respond to said Motion for Summary Judgment until April 25, 2018. [ECF #58].
28

- 1 Said Stipulation was approved on April 10, 2018. [ECF #59].
- 2 3. Defendants' counsel have been required to devote time and attention to numerous
- 3 other pending legal matters since the filing of the Motion for Summary Judgment
- 4 which have detracted from the time available prepare a response.
- 5 4. In addition, the parties have recently entered into settlement negotiations that may
- 6 resolve this matter. Rather than incur additional costs and fees at this time, the
- 7 parties prefer to devote their resources to a potential settlement.
- 8 5. Based upon the foregoing, Defendants have requested and shall be granted an
- 9 extension of time until May 28, 2018, in which to respond to the Plaintiff's
- 10 Motion for Summary Judgment.
- 11 6. This Stipulation is made in good faith and not for purpose of delay.

12 Dated this 24th day of April, 2018.

13 ROGER P. CROTEAU & ASSOCIATES, LTD. AKERMAN, LLP

14

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Thunder Properties, Inc. *Bank of America, N.A.*
20 *and LVDG, LLC [Series 200]*

21 NEVADA ASSOCIATION SERVICES, INC. LIPSON NEILSON COLE
SELTZER GARIN, PC

22

23 /s/ Brandon Wood /s/ David A. Clark
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Sierra Cedars Condominium Homeowners
28 *Hampton & Hampton Collections, LLC* *Association*


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Case No. 3:16-cv-00127-HDM-WGC
STIPULATION AND ORDER TO EXTEND TIME TO
RESPOND TO MOTION FOR SUMMARY JUDGMENT (Second Request)

IT IS SO ORDERED.

By: 
Judge, U.S. District Court

Dated: April 24, 2018