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6 *Attorney for Defendants*
THUNDER PROPERTIES, INC.
7 AND LVDG, LLC [SERIES 1101]

8
9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 ***

12 BANK OF AMERICA, N.A., SUCCESSOR)
BY MERGER TO BAC HOME LOANS)
13 SERVICING, LP, F/K/A COUNTRYWIDE)
HOME LOANS SERVICING LP,)

Case No. 3:16-cv-00183-MMD-VPC

14 Plaintiff,)

15 vs.)

16 SOUTHWEST MEADOWS; LVDG LLC)
17 A/K/A LVDG LLC SERIES 1101; THUNDER)
PROPERTIES, INC.; ALESSI & KOENIG,)
18 LLC,)

19 Defendants.)

20
21 **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO**
MOTION FOR PARTIAL SUMMARY JUDGMENT
22 **(First Request)**

23 COMES NOW Plaintiff, BANK OF AMERICA, N.A. (“*BANA*”), and Defendants,
24 THUNDER PROPERTIES, INC. (“*Thunder*”) and LVDG, LLC [SERIES 1101] (“*LVDG*”), by
25 and through their undersigned counsel, and hereby stipulate and agree as follows:

- 26 1. On January 29, 2019, BANA filed and served its Motion for Partial Summary
27 Judgment [ECF No. 72] (“*Motion*”).
28 2. Pursuant to the Federal Rules of Civil Procedure, an opposition to the Motion is

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presently due from Thunder and LVDG on or before February 19, 2019.

3. As a result of numerous other pending work and personal obligations, including a Reply Brief due on February 19, 2019 in an unrelated Nevada Supreme Court matter, LVDG and Thunder’s counsel has requested and extension of time in which to file its Opposition to the Motion.
4. LVDG and Thunder shall be granted an extension of time in which to file its Opposition to the Motion until March 8, 2019.
5. BANA shall be granted an extension of time in which to file any reply, up to and including March 21, 2019.
6. This Stipulation is made in good faith and not for purpose of delay.

Dated this _____ 19th _____ day of February, 2019.


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AKERMAN, LLP

/s/ Timothy Rhoda
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IT IS SO ORDERED.

By: 

Judge, U.S. District Court

Dated: February 19, 2019