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THUNDER PROPERTIES, INC.

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8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 ***

12 HSBC BANK USA, NATIONAL)
ASSOCIATION as Trustee for Nomura Asset)
13 Acceptance Corporation, Mortgage Pass-)
Through Certificates, Series 2005-AP2,)
14 Plaintiff,)
15 vs.)
16 THUNDER PROPERTIES, INC., a Nevada)
corporation; EAGLE CANYON)
17 ASSOCIATION, a Nevada non-profit)
corporation; RED ROCK FINANCIAL)
18 SERVICES, LLC, a Delaware limited-liability)
company,)
19 Defendants.)
20

Case No. 3:16-cv-00467-RCJ-WGC

21 **STIPULATION AND ORDER TO EXTEND BRIEFING**
22 **SCHEDULE FOR MOTION FOR SUMMARY JUDGMENT**
23 **(First Request)**

24 COMES NOW Plaintiff, HSBC BANK USA, NATIONAL ASSOCIATION , and
25 Defendant, THUNDER PROPERTIES, INC., by and through their undersigned counsel, and
26 hereby stipulate and agree as follows:

- 27 1. On December 15, 2017, Plaintiff filed a Motion for Summary Judgment herein
28 [Doc. #31]. A response to said motion was due on January 5, 2018.

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2. Defendants' counsel has been required to devote time and attention to numerous other pending legal matters since the filing of the Motion for Summary Judgment which lessened the time available to prepare a response. The Christmas and New Years Day holidays also detracted from the time available to prepare a response.
3. Although the due date has technically passed, Defendant's counsel respectfully submits that the failure to timely file a response to the Motion was the result of inadvertence and excusable neglect arising primarily from a large backlog of work that resulted from the holiday season.
4. Defendant shall have an extension of time until January 29, 2018, in which to respond to the Plaintiff's Motion for Summary Judgment. Plaintiff shall have until February 19, 2018, in which to file a Reply.
5. This Stipulation is made in good faith and not for purpose of delay.

Dated this 8th day of January, 2018.

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SNELL & WILMER LLP

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**HSBC BANK USA, NATIONAL
ASSOCIATION**

IT IS SO ORDERED.

By: 
Judge, U.S. District Court

Dated: JANUARY 17, 2018