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6	Attorney for Defendant THUNDER PROPERTIES, INC.			
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9				
10	UNITED STATES DISTRICT COURT			
11	DISTRICT OF NEVADA			
12	***			
13	US BANK NATIONAL ASSOCIATION, AS)			
14	TRUSTEE FOR THE SPECIALTY () UNDERWRITING AND RESIDENTIAL ()			
15	FINANCE TRUST AND MORTGAGE LOAN) ASSET-BACKED CERTIFICATES SERIES)	Case No. 3:16-cv-00501-RC	J-CSD	
16	2006-BC4,)			
17	Plaintiff,)			
18	vs.			
19	WOODLAND VILLAGE; WESTLAND REAL) ESTATE DEVELOPMENT AND			
20	INVESTMENTS; THUNDER PROPERTIES, () INC.; AND PHIL FRINK & ASSOCIATES, ()			
21	INC.,			
22	Defendants.)			
23	ORI	DER TO EXTEND TIME		
24	TO RESPOND TO MOTION FOR SUMMARY JUDGMENT AND MOTION TO STAY DISCOVERY			
25	(First Request)			
26	COMES NOW, Defendant, THUNDER PROPERTIES, INC., and Plaintiff, US BANK			
27	NATIONAL ASSOCIATION, AS TRUSTEE FOR THE SPECIALTY UNDERWRITING AND			
28				
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RESIDENTIAL FINANCE TRUST AND MORTGAGE LOAN ASSET-BACKED CERTIFICATES SERIES 2006-BC4, by and through their undersigned counsel, and hereby stipulate and agree as follows:

- On March 26, 2024, Plaintiff caused a Motion for Summary Judgment and Motion for Protective Order or Motion to Stay Discovery to be filed herein. [ECF #91, 92, 93]. Responses to said Motions are presently due on or about April 9, 2024 and April 16, 2024.
- 2. Defendant's counsel is unable to prepare and file responses by the current deadlines due to various other personal and professional obligations, including the preparation and filing of a Motion to Compel Discovery which is associated with this dispute. Moreover, it will be more efficient and economical to prepare and file all of the required pleadings together.

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1	3. Defendant has requested and shall be granted an extension of time to respond to
	Plaintiff's Motion for Summary Judgment and Motion for Protective Order or
2	Motion to Stay Discovery until April 30, 2024.
3	
4	4. This Stipulation is made in good faith and not for purpose of delay.
5	Dated this 8 th day of April, 2024.
6	ROGER P. CROTEAU & AKERMAN, LLP
7	AND CONTES, ETD.
8	urally of the second of the se
9	<u>/s/ Timothy E. Rhoda</u> <u>/s/ Scott R. Lachman</u> TIMOTHY E. RHODA, ESQ. SCOTT R. LACHMAN, ESQ.
10	Nevada Bar No. 7878 Nevada Bar No. 12016 2810 W. Charleston Blvd., #67 DONNA M. WITTIG, ESQ.
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12	Attorney for Defendant (702) 634-5000 Thunder Properties, Inc. scott.lachman@akerman.com
13	<u>donna.wittig@akerman.com</u>
14	Attorney for Plaintiff U.S. Bank National Association
15	
	IT IS SO ORDERED.
16	By: Janes
17	Judge, U.S. Wistrict Court
18	Dated: April 9, 2024
19	Dated: April 9, 1024
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