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6 *Attorney for Defendants*
7 **THUNDER PROPERTIES, INC.**
AND LVDG, LLC [SERIES 114]

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 ***

11 BANK OF AMERICA, N.A.,)
12)
Plaintiff,)
13 vs.)
14 HIGHLAND RANCH HOMEOWNERS)
ASSOCIATION; LVDG LLC SERIES 114;)
15 ALESSI & KOENIG LLC; THUNDER)
PROPERTIES, INC.,)
16 Defendants.)

Case No. 3:16-cv-00655-RCJ-VPC

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18 **STIPULATION AND ORDER TO EXTEND TIME TO**
RESPOND TO SECOND MOTION FOR SUMMARY JUDGMENT
19 **(First Request)**

20 COMES NOW Plaintiff, BANK OF AMERICA, N.A., and Defendants, LVDG, LLC
21 [SERIES 114] and THUNDER PROPERTIES, INC., by and through their undersigned counsel,
22 and hereby stipulate and agree as follows:

- 23 1. On April 16, 2018, Plaintiff filed a Second Motion for Summary Judgment herein
24 [ECF #50]. A Response was due on May 7, 2018.
- 25 2. A hearing related to the subject Motion has been scheduled to take place on July
26 10, 2018. [ECF #52].
- 27 3. Defendants' counsel's office recently underwent staffing changes which resulted
28 in a unintentional failure to properly calendar the due date for the response to the

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subject Motion. Defendants' counsel respectfully submits that such failure constitutes excusable error.

- 4. Moreover, Defendants' counsel has been required to devote time and attention to numerous other pending legal matters since the filing of the Second Motion for Summary Judgment which detracted from the time available prepare a response.
- 5. Defendants filed a Response to the Second Motion for Summary Judgment on June 1, 2018. [ECF #55].
- 6. Based upon the foregoing, Defendants have requested and shall be granted an extension of time *nunc pro tunc* until June 1, 2018, in which to respond to the Plaintiff's Second Motion for Summary Judgment.
- 7. Plaintiff shall have until June 25, 2018, in which to file any Reply.
- 8. The requested extensions of time will not affect the hearing that is scheduled to take place on July 10, 2018.
- 9. This Stipulation is made in good faith and not for purpose of delay.

Dated this 1st day of June, 2018.

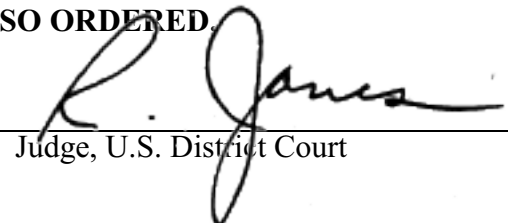
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IT IS SO ORDERED.

By: 
Judge, U.S. District Court

Dated: June 18, 2018.