I

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5	(702) 228-7719 (facsimile) croteaulaw@croteaulaw.com						
6	Attorney for Defendant THUNDER PROPERTIES, INC.						
7	UNITED STATES DISTRICT COURT						
8	DISTRICT OF NEVADA						
9	***						
10	BANK OF AMERICA, N.A.,						
11	) Plaintiff, )						
12	) Case No. 3:17-cv-00087-MMD-WGC						
13							
14	TOWNHOUSE GREENS ASSOCIATION, ) INC. and THUNDER PROPERTIES, INC., )						
15	Defendants. )						
16							
17	STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR PARTIAL SUMMARY JUDGMENT						
18	(First Request)						
19	COMES NOW, Defendants, THUNDER PROPERTIES, INC. and TOWNHOUSE						
20	GREENS ASSOCIATION, INC.; and Plaintiff, BANK OF AMERICA, N.A., by and through						
21	their undersigned counsel, and hereby stipulate and agree as follows:						
22	1. On April 2, 2019, Plaintiff filed a Motion for Partial Summary Judgment herein						
23	[ECF #40]. Responses to said Motion are presently due on April 23, 2019.						
24	2. The parties are presently engaged in settlement discussions and prefer to devote						
25	their time and resources to an effort to amicably resolve the instant matter prior to						
26	engaging in further litigation.						
20	3. In addition, Defendants' counsel have been required to devote time and attention						
27	to numerous other pending legal matters since the filing of the Motion for						
20	Page 1 of 3 336 Smithridge Park						

1		Summary Judgment which have detracted from the time available prepare				
2		responses.				
3	4.	Defendants shall be granted an extension of time until May 14, 2019, in which to				
4		respond to the Plaintiff's Motion for Partial Summary Judgment.				
5	5.	Plaintiff shall have an extension of time until June 4, 2019 in which to file any				
6		Replies.				
7	6.	This Stipulation is made in good faith and not for purpose of delay.				
8	Dated	Dated this $23^{rd}$ day of April, 2019.				
9	ROGER P. C ASSOCIAT		1	AKERMAN, LLP		
10						
11	s/ Timothy I			s/ Melanie D. Morgan		
12	TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878			MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215		
13		ost Road, Suite 100		635 Village Center Circle, Suit Las Vegas, NV 89134	e 200	
14	(702) 254-77	75	(	702) 634-5000		
15	Attorney for Thunder Pro	<u>croteaulaw.com</u> Defendant perties, Inc.	1	lonna.wittig@akerman.com Attorney for Plaintiff Bank of America, N.A.		
16		IENDES LLP	-	oʻj		
17	115010 & M					
18	/s/ Christophe	er A. Lund				
19	CHRISTOPHER AMMON LUND, ESQ. Nevada Bar No. 12435					
20		l Hughes Parkway				
21	Las Vegas, N 702-724-2648					
22	clund@tyson Attorney for	mendes.com				
23		Greens Association, Inc.				
24	IT IS SO ORDERED					
25		By:				
26			- J · _	Judge, U.S. District Court		
27			Dated	l:April 23, 2019		
28						
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1	<u>CERTIFICAT</u>	<u>'E OF SERVICE</u>				
2	I HEREBY CERTIFY that on this <u>2</u> .	day of April, 2019, I ser	ved via the			
3	United States District Court CM/ECF electronic filing system, the foregoing STIPULATION					
4	AND ORDER TO EXTEND TIME TO RESPOND TO MOTION FOR PARTIAL					
5	<b><u>SUMMARY JUDGMENT</u></b> (First Request) to the following parties:					
6	Rex D. Garner Akerman LLP	Christopher Ammon Lund Tyson & Mendes LLP				
7	1635 Village Center Circle, Suite 200 Las Vegas, NV 89134	3960 Howard Hughes Parkway Suite 600				
8	702-634-5007 702-380-8572 (fax)	Las Vegas, NV 89169 702-724-2648				
9	rex.garner@akerman.com	702-938-1048 (fax) clund@tysonmendes.com				
10	Attorney for Plaintiff Bank of America, N.A.	Attorney for Defendant Townhouse Greens Association,	Inc			
11	Melanie D Morgan Akerman LLP	Thomas E. McGrath	1			
12	1635 Village Center Circle, Suite 200 Las Vegas, NV 89134	Tyson & Mendes, LLP 3960 Howard Hughes Parkway				
13	(702) 634-5005 (702) 380-8572 (fax)	Suite 600 Las Vegas, NV 89169				
14	<u>melanie.morgan@akerman.com</u> Attorney for Plaintiff	702-724-2648 702-938-1048 (fax)				
15	Bank of America, N.A.	tmcgrath@tysonmendes.com Attorney for Defendant				
16	Donna M. Wittig Akerman LLP	Townhouse Greens Association,	Inc.			
17	1635 Village Center Circle, Suite 200 Las Vegas, NV 89134					
18	(702) 634-5000 donna.wittig@akerman.com					
19	Attorney for Plaintiff Bank of America, N.A.					
20						
21	/s,	/ <i>Timothy E. Rhoda</i> n employee of ROGER P. CROTEA				
22	Ar	n employee of ROGER P. CROTEA SSOCIATES, LTD.	AU &			
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