

1 LIPSON NEILSON P.C.
 2 Kaleb D. Anderson, Esq.
 Nevada Bar No. 7582
 3 Amber M. Williams, Esq.
 Nevada Bar No. Bar No. 12301
 4 9900 Covington Cross Drive, Suite 120
 Las Vegas, Nevada 89144
 5 Phone: (702) 382-1500
 6 Fax: (702) 382-1512
kanderson@lipsonneilson.com
awilliams@lipsonneilson.com

8 *Attorneys for Defendant*
 9 *Woodchase Condominiums Homeowners Association*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 BANK OF AMERICA, N.A.,

13 Plaintiff,

14 vs.

15 WOODCHASE CONDOMINIUMS
 16 HOMEOWNERS ASSOCIATION; HAMPTON
 17 & HAMPTON COLLECTIONS LLC,

18 Defendants.

CASE NO.: 3:17-cv-00462-MMD-VPC

**STIPULATION & ORDER TO
 EXTEND TIME TO FILE RESPONSE
 TO BANK OF AMERICA,
 N.A.'S COMPLAINT**

(Fourth Request)

19
 20 Plaintiff BANK OF AMERICA, N.A. ("Plaintiff") and Defendant WOODCHASE
 21 CONDOMINIUMS HOMEOWNERS ASSOCIATION ("HOA"), by and through their
 22 respective counsel, hereby agree and stipulate as follows:

23 IT IS HEREBY AGREED AND STIPULATED, that the deadline for the HOA to file
 24 a Response to Plaintiff's Complaint [ECF No. 1], which Plaintiff filed on August 2, 2017,
 25 shall be extended an additional thirty (30) days.

26 The parties previously agreed to extend the deadline until February 22, 2018
 27 pursuant to a Stipulation to Extend (Third Request) that was filed on December 21, 2017
 28 [ECF No. 16], which the Court granted on December 27, 2017 [ECF No. 17].

Lipson Neilson P.C.
 9900 Covington Cross Drive, Suite 120
 Las Vegas, Nevada 89144
 (702) 382-1500 - fax (702) 382-1512

1 The response is currently due on February 22, 2018 and the new deadline will be
2 March 26, 2018. This is the Fourth stipulation for extension of time to file a response.

3 Good cause exists for the extension. The parties have reached a settlement and
4 have signed the settlement agreement and other settlement documents; however, it has
5 taken the parties longer than anticipated to obtain and exchange the settlement
6 payments. Thus, the parties need additional time to finalize the settlement and submit a
7 stipulation and order of dismissal without incurring unnecessary litigation fees and costs.

8 The parties have entered into this agreement in good faith and not for purposes of
9 delay. This is the parties' way of accommodating one another given the overall increase
10 in litigation in this area of law.

11 DATED this 22nd day of February, 2018.

DATED this 22nd day of February, 2018.

12 LIPSON NEILSON P.C.

AKERMAN, LLP

13 /s/ Amber M. Williams

/s/ Scott R. Lachman

14 Kaleb D. Anderson, Esq. (Bar No. 7582)
15 Amber M. Williams, Esq. (Bar No. 12301)
16 9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144

Melanie D. Morgan, Esq. (Bar No. 8215)
Scott R. Lachman, Esq. (Bar No. 12016)
1160 Town Center Drive, Suite 330
Las Vegas, Nevada 89144

17 Attorneys for Defendant
18 Woodchase Condominiums HOA

Attorneys for Plaintiff
Bank of America, N.A.

19
20 **ORDER**

21 IT IS SO ORDERED.

22 DATED: *February 24, 2018.*

23
24 
25 UNITED STATES MAGISTRATE JUDGE
26
27
28

Lipson Neilson P.C.
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 - fax (702) 382-1512