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Electronically Filed
Oct 01 2015 02:14 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

6 IN THE SUPREME COURT
7
8 STATE OF NEVADA

9 SATICOY BAY LLC SERIES 2021 GRAY
EAGLE WAY,

DOCKET NO. 68431

10 Appellant

11 vs.

12 JP MORGAN CHASE BANK, N.A.,

13
14 Respondent
15

16 **MOTION TO PERMIT LATE FILING OF RESPONSE TO**
17 **MOTION FOR RECONSIDERATION OF ORDER GRANTING**
18 **MOTION FOR RECONSIDERATION AND REINSTATING APPEAL**

19 Plaintiff in intervention/appellant Saticoy Bay LLC Series 2021 Gray Eagle
20 Way (hereinafter "Saticoy"), by and through it attorney, Michael F. Bohn Esq., moves
21 the court to permit the late filing of its response to the motion for reconsideration
22 filed by Respondent JPMorgan Chase Bank, N.A. on September 21, 2015. T h i s
23 motion is based on the declaration of Michael F. Bohn, Esq.

24 DATED this 1st day of October 2015.

25 LAW OFFICES OF
MICHAEL F. BOHN, ESQ., LTD.

26 By: /s/ /Michael F. Bohn, Esq. /
27 Michael F. Bohn, Esq.
376 East Warm Springs Road, Ste. 140
28 Las Vegas, Nevada 89119
Attorney for appellant

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MICHAEL F. BOHN, ESQ. states:

1. Declarant is the attorney for the appellant in this case and makes this declaration based upon personal knowledge.

2. Counsel seeks an order permitting the late filing of its response to the motion for reconsideration filed by respondent, JPMorgan Chase Bank, on September 21, 2015.

3. As a result of a calendaring error on my part, I believed the date to file a response to respondent's motion was October 1, 2015. The response was submitted on October 1, 2015, but was rejected by the Clerk of the Court for being filed untimely.

4. As a result of this calendaring error, counsel seeks leave to file the response past the required deadline.

5. Counsel is aware that he is responsible for the proper calendaring of relevant dates, and counsel takes responsibility for the error.

6. If called upon to testify to the above facts, declarant could do so competently.

7. I declare under penalties of perjury under the law of the state of Nevada that the foregoing is true and correct.

DATED this 1st day of October 2015

/S/ /Michael F. Bohn, Esq. /
MICHAEL F. BOHN, ESQ.

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