MICHAEL F. BOHN, ESQ. Nevada Bar No.: 1641 1 mbohn@bohnlawfirm.com LAW OFFICES OF 2 3 MICHAEL F. BOHN, ESQ., LTD. 376 East Warm Springs Road, Ste. 140 Las Vegas, Nevada 89119 (702) 642-3113/ (702) 642-9766 FAX **Electronically Filed** 4 Aug 17 2016 09:05 a.m. 5 Tracie K. Lindemah Attorney for appellant Clerk of Supreme Court 6 7 SUPREME COURT 8 9 STATE OF NEVADA 10 SATICOY BAY LLC SERIES 9641 11 CHRISTINE VIEW, No. 69419 12 Appellant, 13 VS. 14 FEDERAL NATIONAL MORTGAGE ASSOCIATION, 15 Respondent. 16 17 18 19 APPELLANT'S SECOND MOTION 20 TO EXTEND TIME TO FILE REPLY BRIEF 21 Appellant, Saticoy Bay LLC Series 9641 Christine View, by and through it's 22 atorney, Michael F. Bohn, Esq. moves this court for an order permitting the appellant 23 an additional 9 days to file its reply brief. This motion is based on the declaration 24 25 /// 26 /// 27 /// 28

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of Michael F. Bohn, Esq.

DATED this 16<sup>th</sup> day of August, 2016.

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

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

## DECLARATION OF MICHAEL F. BOHN

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. The appellant is seeking an extension to file its reply brief from August 17, 2016 until August 26, 2016.
  - 3. This is the second extension requested in this case.
- 4. The reason for the request for the second extension is as a result of counsel's schedule, and recent developments regarding case law in the context of HOA foreclosure law.
- 5. Declarant is one of the attorneys for one of the parties involved in the case of Bourne Valley Court Trust v. Wells Fargo Bank, Docket No. 15-15233, which was decided by the 9<sup>th</sup> Circuit Court of Appeals. That decision found that the foreclosure statutes of NRS Chapter 116 were unconstitutional.
- 6. As a result of this unexpected decision, counsel has been occupied dealing with the client and working on petitions before the federal appeals court.
- 7. The work on the Bourne Valley case has prevented me from finalizing the reply brief in this case.

- 8. Counsel is requesting an additional period of time to file the reply brief from August 17, 2016 until Friday, August 26, 2016.
- 9. If called upon to testify to the above facts, declarant could do so competently.
- 10. I declare under penalties of perjury under the law of the state of Nevada that the foregoing is true and correct.

DATED this 16th day of August, 2016

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

## **CERTIFICATE OF SERVICE** 1 In accordance with N.R.A.P. 25, I hereby certify that I am an employee of the 2 Law Offices of Michael F. Bohn, Esq., Ltd., and that on the 16th day of August, 3 4 2016, a copy of the foregoing APPELLANT'S SECOND MOTION TO EXTEND 5 TIME TO FILE REPLY BRIEF was served electronically through the Court's 6 electronic filing system to the following individuals: 7 Leslie Bryan Hart, Esq. Fennemore Craig, P.C. 300 E. Second St. Suite 1510 Robert L. Eisenberg Lemons Grundy & Eisenberg 6005 Plumas Street, Third Floor 8 Reno, NV 89519 Reno, NV 89501 Laurel I. Handley, Esq. PITE DUNCAN, LLP 520 South Fourth Street, Suite 360 Las Vegas, NV 89101 Howard N. Cayne, Esq Arnold & Porter, LLP 601 Massachusetts Avenue NW 10 11 Washington, DC 20001 12 Michael R. Brooks, Esq. BROOKS HUBLEY LLP 1645 Village Center Circle 13 Suite 60 14 Las Vegas, NV 89134 15 16 17 /s/ /Marc Sameroff / An Employee of the LAW OFFICES OF 18 MICHAEL F. BOHN, ESQ., LTD. 19 20 21 22 23 24 25 26 27

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