

1 MICHAEL F. BOHN, ESQ.
2 Nevada Bar No.: 1641
3 mbohn@bohnlawfirm.com
4 LAW OFFICES OF
5 MICHAEL F. BOHN, ESQ., LTD.
6 376 East Warm Springs Road, Ste. 140
7 Las Vegas, Nevada 89119
8 (702) 642-3113/ (702) 642-9766 FAX

9 Attorney for appellant

Electronically Filed
Aug 17 2016 09:05 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

10 SUPREME COURT

11 STATE OF NEVADA

12 SATICOY BAY LLC SERIES 9641
13 CHRISTINE VIEW,

No. 69419

14 Appellant,

15 vs.

16 FEDERAL NATIONAL MORTGAGE
17 ASSOCIATION,

18 Respondent.

19
20 **APPELLANT'S SECOND MOTION**
21 **TO EXTEND TIME TO FILE REPLY BRIEF**

22 Appellant, Saticoy Bay LLC Series 9641 Christine View, by and through it's
23 attorney, Michael F. Bohn, Esq. moves this court for an order permitting the appellant
24 an additional 9 days to file its reply brief. This motion is based on the declaration

25 ///

26 ///

27 ///

1 of Michael F. Bohn, Esq.

2 DATED this 16th day of August, 2016.

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

5 By: /s/ /Michael F. Bohn, Esq. /
6 Michael F. Bohn, Esq.
7 376 East Warm Springs Road, Ste. 140
8 Las Vegas, Nevada 89119
9 Attorney for appellant

10 **DECLARATION OF MICHAEL F. BOHN**

11 MICHAEL F. BOHN, ESQ. states:

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

14 2. The appellant is seeking an extension to file its reply brief from August 17,
15 2016 until August 26, 2016.

16 3. This is the second extension requested in this case.

17 4. The reason for the request for the second extension is as a result of
18 counsel's schedule, and recent developments regarding case law in the context of
19 HOA foreclosure law.

20 5. Declarant is one of the attorneys for one of the parties involved in the case
21 of Bourne Valley Court Trust v. Wells Fargo Bank, Docket No. 15-15233, which was
22 decided by the 9th Circuit Court of Appeals. That decision found that the foreclosure
23 statutes of NRS Chapter 116 were unconstitutional.

24 6. As a result of this unexpected decision, counsel has been occupied dealing
25 with the client and working on petitions before the federal appeals court.

26 7. The work on the Bourne Valley case has prevented me from finalizing the
27 reply brief in this case.
28

1 8. Counsel is requesting an additional period of time to file the reply brief from
2 August 17, 2016 until Friday, August 26, 2016.

3 9. If called upon to testify to the above facts, declarant could do so
4 competently.

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

7 DATED this 16th day of August, 2016

8
9 /S/ /Michael F. Bohn, Esq. /
10 MICHAEL F. BOHN, ESQ.

