

1 ROGER P. CROTEAU, ESQ.
Nevada Bar No. 4958
2 TIMOTHY E. RHODA, ESQ.
Nevada Bar No. 7878
3 ROGER P. CROTEAU & ASSOCIATES, LTD.
2810 West Charleston Blvd. #75
4 Las Vegas, Nevada 89102
(702) 254-7775
5 (702) 228-7719 (facsimile)
croteaulaw@croteaulaw.com
6 *Attorney for Appellant*
AIRMOTIVE INVESTMENTS, LLC
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8

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Elizabeth A. Brown
Clerk of Supreme Court

9 IN THE SUPREME COURT OF THE STATE OF NEVADA

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11 AIRMOTIVE INVESTMENTS, LLC, A)	
NEVADA LIMITED LIABILITY COMPANY,)	
)	
12 Appellant,)	Supreme Court No. 80373
)	
13 vs.)	
)	
14 BANK OF AMERICA, N.A.,)	District Court Case No. A654840
)	
15 Respondent.)	

16 **STIPULATION TO EXTEND TIME TO FILE REPLY BRIEF**

17 **(First Request)**

18 COMES NOW Appellant, AIRMOTIVE INVESTMENTS, LLC (“*Airmotive*”), and
19 Respondent, BANK OF AMERICA, N.A., by and through their respective undersigned counsel,
20 and hereby jointly stipulate to extend the time for the filing of the Reply Brief herein, stating as
21 follows:

- 22 1. The instant appeal was filed on January 2, 2020.
 - 23 2. The matter was initially assigned to the Supreme Court’s Settlement Program.
24 The parties made various efforts to resolve the matter until the case was
25 eventually released from the Settlement Program pursuant to an Order filed on
26 July 22, 2020.
 - 27 3. Appellant filed its Opening Brief and Appendix on December 21, 2020.
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Respondent filed its Answering Brief on March 22, 2021. Pursuant to an Order entered on May 24, 2021, Appellant’s Reply Brief is presently due on June 23, 2021.

4. Airmotive is currently negotiating with Federal Housing Finance Agency, Fannie Mae and Freddie Mac to potentially globally resolve all of its outstanding litigation and appeals related to real property that purportedly secures loans owned by said entities. Airmotive has made a substantial offer to which it is awaiting a response. Airmotive’s sister company, Thunder Properties, Inc., has recently completed a similar agreement involving its properties. In the event that Airmotive and said parties are able to reach a similar agreement, the instant appeal will be resolved and rendered moot.

5. The parties hereto prefer to devote their time and resources to a potential settlement rather than additional briefing that may be rendered unnecessary. In addition, Appellant’s counsel has various other pending obligations, including other appellate briefs and motion practice, that will make completing the Reply Brief herein by the existing deadline difficult.

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1 6. Based upon the foregoing, the parties hereto jointly request that the deadline to
2 file the Reply Brief herein by extended for a period of 30 days, until Friday, July
3 23, 2021.

4 7. This stipulation is made in good faith and not for purpose of delay.

5 Dated this 21st day of June, 2021.

6 ROGER P. CROTEAU &
7 ASSOCIATES, LTD.

AKERMAN LLP

8 /s/ Timothy E. Rhoda
9 ROGER P. CROTEAU, ESQ.
10 Nevada Bar No. 4958
11 TIMOTHY E. RHODA, ESQ.
12 Nevada Bar No. 7878
13 2810 West Charleston Blvd., Suite 75
14 Las Vegas, Nevada 89102
15 (702) 254-7775
16 **Attorney for Appellant**
17 **Airmotive Investments, LLC**

8 /s/ Scott R. Lachman
9 ARIEL E. STERN, ESQ.
10 Nevada Bar No. 8276
11 MELANIE D. MORGAN, ESQ.
12 Nevada Bar No. 8215
13 SCOTT R. LACHMAN, ESQ.
14 Nevada Bar No. 12016
15 1635 Village Center Circle, Suite 200
16 Las Vegas, Nevada 89134
17 (702) 634-5000
18 **Attorney for Respondent**
19 **Bank of America, N.A.**

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of ROGER P. CROTEAU & ASSOCIATES, LTD.
and that on the 21st day of June, 2021, I caused a true and correct copy of the foregoing
document to be served on all parties as follows:

X VIA ELECTRONIC SERVICE: through the Nevada Supreme Court's efile and
serve system.

 VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with
postage thereon fully prepaid, addressed as indicated on service list below in the United
States mail at Las Vegas, Nevada.

Stephen E. Haberfeld
8224 Blackburn Avenue #100
Los Angeles, CA 90048
Settlement Judge

 VIA FACSIMILE: by causing a true copy thereof to be telecopied to the number indicated
on the service list below.

 VIA PERSONAL DELIVERY: by causing a true copy hereof to be hand delivered on this
date to the addressee(s) at the address(es) set forth on the service list below.

/s/ Timothy E. Rhoda
An employee of ROGER P. CROTEAU &
ASSOCIATES, LTD.