

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

U.S. BANK N.A., AS TRUSTEE FOR  
THE SPECIALTY UNDERWRITING  
AND RESIDENTIAL FINANCE  
TRUST MORTGAGE LOAN ASSET-  
BACKED CERTIFICATES SERIES  
2006-BC4,

Appellant,

vs.

THUNDER PROPERTIES, INC.; AND  
WESTLAND REAL ESTATE  
DEVELOPMENT AND  
INVESTMENTS,

Respondents.

Supreme Court No. 81129

Electronically Filed  
Feb 17 2021 07:07 p.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

Certified Question from the United States Court of Appeals for the Ninth Circuit  
Case No. 17-16399

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**UNOPPOSED MOTION FOR LEAVE TO EXTEND TIME TO FILE  
REPLY BRIEF AND RESPONSE TO AMICUS BRIEF**

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Appellant, U.S. Bank as Trustee for the Specialty Underwriting and Residential Finance Trust Mortgage Loan Asset-Backed Certificates Series 2006-BC4 (**US Bank**) moves for leave to reopen and extend the deadline to file its reply by thirty (30) days, through **March 18, 2021**, as well as the deadline to file its response to SFR's amicus brief.

US Bank has not received any prior extensions with respect to its reply. Good cause exists for U.S. Bank's requested relief. U.S. Bank had the reply calendared as being due 30 days after Thunder Properties' response was filed, or February 24, 2021, in accordance with NRAP 31(a)(1). When SFR filed its amicus brief on February 16, 2021, counsel for U.S. Bank sought to determine its response deadline to the amicus brief, to coordinate it with the deadline for US Bank's reply. In reviewing the court's website, counsel learned the deadline for its reply was calendared as February 16, 2021, or 21 days after Thunder's response was filed, pursuant to the scheduling order issued by the court on September 11, 2020. Undersigned counsel therefore immediately prepared the instant motion for leave to reopen and extend the briefing schedule.

U.S. Bank does not file this motion to cause delay or prejudice to any party. It would have been impractical for U.S. Bank to file a reply on the same date an amicus brief in support of the respondent is due, when generally such an amicus brief would be filed 7 days after the respondent's brief, or at least 14 days prior to

appellant's reply brief. See Rule 29(f). Counsel for U.S. Bank has contacted counsel for Thunder Properties and SFR, and they do not object to the extension. Therefore, US Bank respectfully requests the court reopen the briefing deadline and extend US Bank's reply deadline, and set the deadline to respond to SFR's amicus brief simultaneously, to **March 18, 2021**.

Dated this 17th day of February, 2021.

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/s/ Jamie K. Combs

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