JOINT STIPULATION TO EXTEND DEFENDANT'S RESPONSIVE MOTION DEADLINES COMMENSURATE WITH THE EXTENSIONS GRANTED TO PLAINTIFF IN DKT. #115

Gurshin v. Bank of America, N.A.

Doc. 119

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The parties, Plaintiff Alexis Gurshin ("Plaintiff") and Defendant Bank of America, N.A. ("Defendant" or "BANA") (collectively, the "Parties"), through their respective attorneys of record, hereby stipulate as follows:

RECITALS

- 1. On November 7, 2016, Plaintiff filed a Joint Stipulation to Extend 11/8/16 Filing Deadline For Filing RFA-Related Deadlines As Ordered in ECF No. 108 and 113, For Two Days (Dkt. #114), which requested that the Court extend Plaintiff's deadline to file her response in opposition to Defendant's Motion for Order Deeming Defendant's Second Set of Requests For Admissions to Plaintiff, Or Alternatively, Compelling Responses (Dkt. #106) and her deadline to file a motion to compel Defendant's responses to Plaintiff's Requests for Admission, from 11/8/2016 to 11/10/2016 due to a scheduling conflict of Plaintiff's counsel. On November 8, 2016, this Court granted the request. See Dkt. #115.
- 2. The Parties inadvertently neglected to request a commensurate extension of Defendant's related deadlines – namely, Defendant's 11/15/16 deadline to file a reply in support of its Motion (Dkt. #106), and Defendant's 11/15/16 deadline to oppose the anticipated motion of Plaintiff to compel Defendant's responses to Plaintiff's Requests for Admission – deadlines which were previously set by the Court in Dkts. #108 and 113, respectively. A commensurate extension is necessary to afford Defendant a fair opportunity to respond to Plaintiff's anticipated filings, as originally contemplated.

STIPULATION

3. NOW, THEREFORE, based on the foregoing, the Parties stipulate to request this Court for a commensurate two-day extension (to November 17, 2016) for Defendant to file a reply in support of its Motion (Dkt. #106) and to oppose any motion by Plaintiff to compel Defendant's responses to Plaintiff's Requests for Admission.

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1	IT IS SO STIPULATED.	
2	Dated: November 10, 2016	Dated: November 10, 2016
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13		Attorneys for Defendant BANK OF AMERICA, N.A.
14		AMERICA, N.A.
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16	IT IS S	O ORDERED:
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19	UNITE	D STATES MAGISTRATE JUDGE
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1	IT IS SO STIPULATED.	
2	Dated: November 14, 2016	Dated: November 14, 2016
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4		/s/ Lindsay L. Ryan
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12	Attorneys for Plaintiff ALEXIS GURSHIN	chad.butterfield@wilsonelser.com
13		Attorneys for Defendant BANK OF AMERICA, N.A.
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15	IT IS SO ORDERED:	
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