

1 KATHLEEN J. ENGLAND, NV Bar #206
 2 **ENGLAND LAW OFFICE**
 3 630 South Third Street
 4 Las Vegas, Nevada 89101
 5 Phone: 702.529-2311
 6 E-mail: kengland@englandlawoffice.com

7 MARGARET A. MCLETCHIE, NV Bar #10931
 8 ALINA M. SHELL, NV Bar #11711
 9 **MCLETCHIE SHELL LLC**
 10 701 East Bridger Ave., Ste. 520
 11 Las Vegas, Nevada 89101
 12 Phone: 702.728-5300; Fax: 702.425.8220
 13 Email: maggie@nvlitigation.com; alina@nvlitigation.com
 14 *Attorneys for Plaintiff, Alexis Gurshin*

15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

17 **ENGLAND LAW OFFICE**
 18 **ATTORNEYS AT LAW**
 19 **630 SOUTH THIRD STREET**
 20 **LAS VEGAS, NEVADA 89101**
 21 **(702) 529-2311**

22 ALEXIS GURSHIN,

23 Plaintiff,

24 vs.

25 BANK OF AMERICA, NATIONAL
 26 ASSOCIATION; DOES 1-X, ROE
 27 BUSINESS ENTITIES I- X, inclusive,
 28 Defendants

) Case No. 2:15-cv-00323-GMN-VCF

) **STIPULATION TO POSTPONE**
) **JULY 5, 2016 FILING AND**
) **JULY 7, 2016 STATUS HEARING**

) (First Request)
)
)

20 At the May 18, 2016 Court hearing on various motions, the Court issued certain rulings,
 21 directed counsel for the respective parties to meet, attempt to work or at least narrow disputed
 22 discovery issues, and the to file concise statements of remaining issues by 12:00 p.m. on July
 23 5, 2016. The Court then set a status conference on July 7, 2016. (ECF No. 86, issued on May
 24 19, 2016.)

25 Thereafter, and in the meantime, Defendant BANK OF AMERICA, N.A. (“BANA”),
 26 responded to then pending discovery requests by Plaintiff. On June 5, 2016, Plaintiff postponed
 27 the previously subpoenaed Rule 30(b)(6) deposition of BANA (regarding Subject No. 6). On
 28 June 6, 2016, BANA requested Plaintiff’s available dates to conduct the Rule 30(b)(6)

1 deposition(s) of BANA (pursuant to the category and time limitations imposed by the Court in
2 its May 18, 2016 ruling), but Plaintiff has not provided available dates since that time. . On
3 June 22, 2016, BANA took the deposition of Plaintiff's current employer, Geoffrey Baughman,
4 also in accord with the Court's rulings on May 18, 2016.

5 Plaintiff's undersigned lead counsel was unable to actively participate in all of the other
6 expected meet and confer and discovery dispute resolution activities during the month of June
7 2016, due to a knee injury she sustained on June 3, 2016, and the subsequent medical treatment
8 in the following week and which is continuing. Additionally, most of Plaintiff's undersigned
9 counsel's available time in June was required to participate in the final discovery activities in
10 *Roberts v. Clark County School District*, U.S. District Court Case No. 2:15-dv-00388, which
11 included moving and the taking of numerous depositions of CCSD school officials, which were
12 postponed and moved due to Ms. England's injury. Additionally, the Court set final
13 supplemental briefing for the cross-motions for summary judgment, which itself was extended
14 from June 30, 2016 to July 14, 2016 to accommodate Ms. England's injury and unavailability,
15 as she is lead counsel and was the attorney prepared to take these depositions, the last of which
16 will take place on June 30, 2016. (*See, Roberts v. CCSD, ECF. Nos.132, 133, 134 and 135.*) In
17 addition to medical appointments on July 5, 2016, due to the sale of her office building by the
18 existing landlord, Ms. England is moving her office and physical location during the week of
19 July 6-8, 2016.

20 In light of these unexpected and unavoidable time constraints, undersigned Plaintiff's
21 counsel asked counsel for BANA to join her in this request to allow the parties additional time
22 to meet and confer on numerous discovery matters, to request that the filing of the concise
23 statement of remaining discovery issues be postponed to July 21, 2016 or later, and for the status
24 conference to be continued as soon as practically possible thereafter (preferably July 25 or 26).
25 For these and other good and just cause,

26 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff ALEXIS
27 GURSHIN, through her attorney, Kathleen J. England of England Law Office, and Defendant
28 BANK OF AMERICA, N.A., through its attorneys, Bethany A. Pelliconi and Lindsay L. Ryan

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1 of McGuireWoods LLP, to request that the filing of the concise statement of remaining
2 discovery issues be postponed to July 21, 2016 or later, and for the status conference to be
3 continued as soon as practically possible thereafter (preferably July 25 or 26) at the Court's
4 convenience.

5 Respectfully submitted:

6 Dated: June 29, 2016

Dated: June 29, 2016

7 ENGLAND LAW OFFICE

MCGUIREWOODS LLP

8 By: /s/
9 Kathleen J. England
10 630 South Third Street
Las Vegas, NV 89101

By: /s/
Bethany A. Pelliconi, *Pro Hac Vice*
Lindsay L. Ryan, *Pro Hac Vice*
1800 Century Park East, 8th Floor
Los Angeles, CA 90067-1501

11 *Attorneys for Plaintiff,*
12 **ALEXIS GURSHIN**

Attorneys for Defendant,
BANK OF AMERICA, N.A.

13
14
15
16 **IT IS SO ORDERED.**

DATED: July 5, 2016.

17 
18 CAM FERENBACH
19 United States Magistrate Judge

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21 IT IS HEREBY ORDERED that a status hearing is scheduled for 3:00 p.m., July 26, 2016, in
22 courtroom 3D.
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