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8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 JPMORGAN CHASE BANK, N.A.
 11
 Plaintiff,
 12
 13 vs.
 14 SFR INVESTMENTS POOL 1, LLC, a
 Nevada limited liability company;
 15 MOUNTAIN'S EDGE MASTER
 ASSOCIATION, a Nevada non-profit
 16 corporation; and DIAMOND CREEK
 HOMEOWNERS' ASSOCIATION, a
 17 Nevada non-profit corporation.
 18
 Defendants.

Case No. 2:16-cv-02779-JCM-GWF

**STIPULATION AND ORDER TO
 EXTEND SCHEDULING ORDER**

(First Request)

19
 20 SFR INVESTMENTS POOL 1, LLC., a
 Nevada limited liability company,
 21
 Counter-Claimant,
 22
 23 vs.
 24 JPMORGAN CHASE BANK, N.A.
 25
 Counter-Defendant.

26 SFR INVESTMENTS POOL 1, LLC., a
 Nevada limited liability company,
 27
 Cross-Claimant,
 28

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1 vs.
2 SIU MING PANG, an individual,
3 Cross-Defendant.
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5 Pursuant to LR IA 6-1 and LR 26-4, plaintiff/counter-defendant JPMorgan
6 Chase Bank, N.A. (“Chase”), defendant/counterclaimant SFR Investments Pool 1,
7 LLC (“SFR”), defendant Diamond Creek Homeowners’ Association (the “HOA) (all
8 parties together, the “Parties”),¹ by and through their respective counsel of record,
9 stipulate and request that this Court extend discovery and dispositive motion
10 deadlines in the above-captioned case by approximately 90 days, to permit the
11 Parties to efficiently complete party depositions and outstanding written discovery.
12 The Parties have conferred and agree that this brief extension is the most
13 reasonable, most economical, and least burdensome way to complete discovery in
14 this case.²

15 This is the parties’ first request for an extension to the scheduling order
16 deadlines, which were submitted in compliance with LR 26-1. The parties make
17 this request in good faith and not for purposes of delay.

18 **I. Discovery Completed to Date**

19 To date, Chase has served the following discovery: initial disclosures; initial
20 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of
21 Rule 30(b)(6) deposition of SFR; requests or production to the HOA; interrogatories
22 to the HOA; and deposition of the HOA.

23 To date, SFR has served the following discovery: initial disclosures; requests
24 for production to Chase; interrogatories to Chase; requests for admission to Chase;

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26 ¹ Mountain’s Edge Master Association is no longer a party to this case. Siu Ming
Pang has not appeared.

27 ² The Parties expressly agree to waive the clause of the Discovery Plan and
28 Scheduling Order in which the Parties requested a 21-day notice for extensions of
discovery.

1 notice of deposition of Chase.

2 **B. Specific Description of Discovery that Remains to be Completed**

3 The parties are awaiting responses to the served discovery requests prior to
4 taking the respective Rule 30(b)(6) depositions. In addition, they are working to
5 schedule third-party and party depositions. The parties have also noticed Rule
6 30(b)(6) party depositions for SFR and Chase. As discussed below, however, they
7 seek to schedule Chase's deposition to occur after the current discovery cutoff.³

8 **C. Good Cause Exists for the Requested Extension**

9 Good cause exists for the requested extension, as it will provide time for the
10 parties to complete written discovery and schedule depositions in a way that
11 minimizes burden and increases efficiency. SFR served voluminous written
12 (approximately 170 discovery requests) on Chase on the last day to serve discovery.
13 While Chase requires additional time to respond to SFR's discovery, Chase's current
14 response deadline is December 4, 2017—*i.e.*, the last day of the discovery period.
15 SFR is willing to provide Chase with an extension for its responses, but it cannot do
16 so unless discovery is extended.

17 Additionally, SFR has noticed Chase's deposition for November 28, 2017, but
18 Chase's Rule 30(b)(6) designee is unavailable on this date due other depositions.
19 The parties have met and conferred about rescheduling the deposition to take place
20 during February 2018, when the Chase designee will be available and in Las
21 Vegas.⁴ This approach will significantly minimize the cost and burden to the
22 witness. Moreover, scheduling the Chase deposition during this time period will
23 also allow SFR to obtain Chase's written discovery responses before deposing
24 Chase, a logical process that will enable SFR to conduct an efficient, productive, and

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27 ³ The parties further reserve their rights to meet and confer and, if necessary,
engage in motion practice regarding any discovery issues that may arise.

28 ⁴ Chase's designee needs until February 2018 to conduct the deposition due to an
upcoming medical procedure.

1 targeted deposition. SFR anticipates that it will be able to significantly limit the
2 scope of the deposition based on the responses to its written discovery.

3 Finally, this is the parties' first request to extend discovery, and the parties
4 do not anticipate any further extensions. The parties have diligently engaged in
5 discovery to date and seek this extension in good faith.

6 **D. Proposed Discovery Deadlines**

7 The parties request an order extending the close of discovery, the deadline to
8 file dispositive motions, and the deadline to file a pre-trial order. This extension is
9 reasonable and necessary given the good cause set forth above.

Event	Current Deadline ⁵	New Deadline
Close of Discovery	December 4, 2017	February 28, 2018
Dispositive Motions	January 3, 2018	March 27, 2018
Pre-Trial Order	February 2, 2018	April 26, 2018

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14 **IT IS SO STIPULATED.**

15 Respectfully submitted this 27th day of November, 2017.

16 17 Ballard Spahr LLP 18 By: <u>/s/ Russell J. Burke</u> 19 Joel E. Tasca, Esq. 20 NV Bar No. 14124 21 Russell J. Burke, Esq. 22 NV Bar 12710 100 N. City Parkway, Suite 1750 Las Vegas, NV 89106 <i>Attorneys for JPMorgan Chase Bank, N.A.</i>	Hall, Jaffe & Clayton, LLP By: <u>/s/ Ashlie L. Surur</u> Ashlie L. Surur, Esq. NV Bar No. 11290 7425 Peak Drive Las Vegas, NV 89128 <i>Attorneys for Diamond Creek Homeowners' Association</i>
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⁵ See Scheduling Order, ECF No. 26.

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Kim Gilbert Ebron

By: /s/ Diana S. Ebron
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Attorneys for SFR Investments Pool 1, LLC

ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 11/28/2017