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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 JPMORGAN CHASE BANK, N.A.

12 Plaintiff,

13 vs.

14 SFR INVESTMENTS POOL 1, LLC, a
 15 Nevada limited liability company;
 MOUNTAIN'S EDGE MASTER
 16 ASSOCIATION, a Nevada non-profit
 corporation; and DIAMOND CREEK
 17 HOMEOWNERS' ASSOCIATION, a
 Nevada non-profit corporation.

18 Defendants.

19 SFR INVESTMENTS POOL 1, LLC., a
 20 Nevada limited liability company,

21 Counter-Claimant,

22 vs.

23 JPMORGAN CHASE BANK, N.A.

24 Counter-Defendant.

25 SFR INVESTMENTS POOL 1, LLC., a
 26 Nevada limited liability company,

27 Cross-Claimant,

28 vs.

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

**STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES BY 30 DAYS**

(Second Request)

Ballard Spahr LLP
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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/Cross-Claimant SFR
7 Investments Pool 1, LLC (“SFR”), and Diamond Creek Homeowners’ Association
8 (“Diamond Creek”),¹ by and through their respective counsel of record, stipulate and
9 request that this Court extend discovery and dispositive motion deadlines in the
10 above-captioned case for an additional 30 days, to permit the parties to complete
11 party depositions, and specifically the deposition of Chase, whose designated
12 witness who underwent significant surgery in December and from which she will
13 not have recuperated until February 2018. The parties have conferred and agree
14 that this brief extension is the most reasonable way to complete discovery in this
15 case, including so that Chase’s designated witness has sufficient time to attend to
16 necessary medical treatment.

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

20 **A. Discovery Completed to Date**

21 To date, Chase has served the following discovery: initial disclosures; initial
22 expert disclosure; first set of requests for production and interrogatories to SFR;
23 notice of Rule 30(b)(6) deposition of SFR; first set of requests for production and
24 interrogatories to Diamond Creek; and notice of Rule 30(b)(6) deposition of Diamond
25 Creek.

26 To date, SFR has served the following discovery: initial disclosures; first set

27 _____
28 ¹ Although Cross-Defendant Siu Ming Pang has been served in this case, (*see* ECF
No. 38), Mr. Pang has not otherwise appeared, and, therefore, this stipulation and
order is submitted without his signature.

1 of requests for production, interrogatories, and requests for admissions to Chase;
2 and notice of Rule 30(b)(6) deposition of Chase. SFR has also responded to Chase's
3 requests for production and interrogatories to SFR.

4 To date Diamond Creek has served the following discovery: initial
5 disclosures.

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

7 SFR has also noticed a Rule 30(b)(6) deposition of Chase. As discussed below,
8 however, the parties seek to reschedule Chase's to occur after the current discovery
9 cutoff of February 28, 2018.²

10 Chase has also noticed the Rule 30(b)(6) deposition of SFR and Diamond
11 Creek.

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

13 SFR has noticed Chase's deposition for March 20, 2018, which is after the
14 current close of discovery. Chase's Rule 30(b)(6) designee is not available until
15 March due to significant surgery that occurred in December. The parties have met
16 and conferred about rescheduling Chase's deposition in this lawsuit to take place on
17 March 20, 2018, when the Chase designee should be recuperated from surgery and
18 able to travel to Las Vegas. This is the parties' second request to extend the
19 standard, 180-day discovery period in this case, and they seek the extension so that
20 Chase's designated witness may have an opportunity to receive necessary medical
21 treatment and recover from the same. The parties have diligently engaged in
22 discovery to date and seek this extension in good faith, and do not anticipate any
23 further extensions of the discovery deadlines.

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28 ² The parties further reserve their rights to meet and confer and, if necessary, engage in motion practice regarding any discovery issues that may arise.

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D. Proposed Discovery Deadlines

The parties request an order extending the close of discovery, the deadline to file dispositive motions, and the deadline to file a pre-trial order by 30 days.

Event	Current Deadline³	New Deadline
Close of Discovery	February 28 2018	March 30, 2018
Dispositive Motions	March 27, 2018	April 26, 2018
Pre-Trial Order	April 26, 2018	May 25, 2018

³ See Scheduling Order, ECF No. 47.

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1 This extension is reasonable and necessary given the good cause set forth
2 above.

3 **IT IS SO STIPULATED.**

4 Respectfully submitted this 8th day of February, 2018.

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6 Ballard Spahr LLP 7 By: <u>/s/ Russell J. Burke</u> 8 Abran Vigil, Esq. 9 NV Bar No. 7548 10 Russell J. Burke, Esq. 11 NV Bar 12710 12 1980 Festival Plaza Drive, Suite 900 13 Las Vegas, NV 89135 14 <i>Attorneys for JPMorgan Chase Bank,</i> 15 <i>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</i> <i>Homeowners' Association</i>
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17 Kim Gilbert Ebron 18 By: <u>/s/ Diana S. Ebron</u> 19 Diana S. Ebron, Esq. 20 NV Bar No. 10580 21 7625 Dean Martin Drive, Suite 110 22 Las Vegas, NV 89139 23 <i>Attorneys for SFR Investments Pool 1,</i> 24 <i>LLC</i>	
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25 **ORDER**

26 IT IS SO ORDERED:

27 
28 UNITED STATES MAGISTRATE JUDGE

DATED: 2/9/2018