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8 *Attorneys for HSBC Bank USA, N.A.*

9  
10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 HSBC BANK USA, N.A.,  
13 Plaintiff,

14 vs.

15 IRIS WU, an individual; NEWPORT  
16 COVE CONDOMINIUM UNIT-OWNERS  
ASSOCIATION, INC., a Nevada non-  
17 profit corporation; MATTHEW AYRES,  
an individual,  
18 Defendants.

19  
20 IRIS WU,  
Counter-Claimant,

21 vs.

22 HSBC BANK USA, N.A.;  
23 DOES 1 through X and ROE BUSINESS  
ENTITIES 1 through X,  
24 Counter-Defendants.

Case No. 2:16-CV-02786-APG-CWH

**STIPULATED AND PROPOSED  
ORDER TO AMEND SCHEDULING  
ORDER (ECF NO. 28)  
(First Request)**

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26 Pursuant to Fed. R. Civ. P. 16(b)(4), LR IA 6-1 and LR 26-4, Plaintiff HSBC  
27 Bank USA, N.A. (“HSBC”), Defendant Newport Cove Condominium Unit-Owners  
28 Association, Inc. (the “HOA”), and Defendants Iris Wu (“Wu”) (collectively, the

1 “Parties”) by and through their undersigned counsel of record, hereby stipulate to  
2 amend the Scheduling Order approved on November 13, 2017 (ECF No. 28). This is  
3 the Parties first request for an extension of the subject deadlines.

4 A. Discovery completed: HSBC served initial disclosures on December 06,  
5 2017. HSBC served its initial expert disclosure on March 3, 2018. HSBC served  
6 written discovery on the defendants and the deposition of a third party, Alessi &  
7 Koenig, has been noticed by HSBC.

8 B. Discovery to Be Completed:

- 9 1. Continued production of documents as they are located;  
10 2. Written discovery responses;  
11 3. Deposition of Parties and third parties.

12 C. Current Discovery Deadlines:

- 13 1. Discovery cut-off: May 5, 2018  
14 2. Dispositive motions: June 6, 2018  
15 3. Joint pretrial order: July 9, 2018

16 D. Reason for Extending Discovery Plan Deadlines

17 The Parties seek to extend discovery and scheduling dates 30 days. On April 2,  
18 2018, HSBC noticed the depositions of the HOA and Wu. The depositions were  
19 scheduled for April 30, 2018. After the non-appearance of the HOA for its scheduled  
20 deposition, it also came to light that Wu had a scheduling conflict. As such, the  
21 parties agreed to extend the discovery schedule to allow the depositions of Wu and  
22 the HOA to move forward. The brief extension of 30 days will give HSBC time to re-  
23 notice the depositions and conduct them. Further, no parties will be prejudiced by the  
24 brief extension to discovery.

25 E. Proposed Schedule for Completed Discovery:

26 Accordingly, all Parties hereby stipulate and jointly request that the Court  
27 enter an Amended Scheduling Order to establish the following deadlines:

- 28 1. Discovery cut-off: June 4, 2018

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2. Dispositive motions: July 5, 2018

3. Joint pretrial order: August 6, 2018

The Parties make this request in good faith and not for the purposes of delay.

IT IS SO STIPULATED this 2 day of May, 2018.

BALLARD SPAHR LLP

HONG & HONG

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**ORDER**

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
United States District Magistrate Judge

DATED: May 3, 2018