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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 JPMORGAN CHASE BANK, N.A., a
national banking association,
15
16 Plaintiff,

17 v.

18 SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company; SEVEN
19 HILLS MASTER COMMUNITY
ASSOCIATION; and MOUSHIR
MANIOUS, an individual.
20
21 Defendants.

CASE NO.: 2:17-cv-00004-GMN-CWH

**STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES BY 60 DAYS**

(First Request)

22 SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company
23
24 Counter/Cross-Claimant,

25 v.

26 JPMORGAN CHASE BANK, N.A., a
national banking association; UNITED
GUARANTY RESIDENTIAL INSURANCE
COMPANY OF NORTH CAROLINA;
27 MOUSHIR, an individual
28
Counter/Cross-Defendants.

1 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan
2 Chase Bank, N.A. (“Chase”), Defendant/Counterclaimant/Cross-Claimant SFR
3 Investments Pool 1, LLC (“SFR”), and Defendant Seven Hills Master Community
4 Association (the “HOA”) stipulate and request that this Court extend discovery and
5 dispositive motion deadlines in the above-captioned case for 60 days, to permit the
6 parties to efficiently complete depositions and outstanding written discovery. The
7 parties have conferred and agree that this brief extension is the most reasonable,
8 most economical, and least burdensome way to complete discovery in this case.

9 This is the parties’ first request for an extension to the scheduling order
10 deadlines. The parties make this request in good faith and not for purposes of delay.

11 **A. Discovery Completed to Date**

12 To date, Chase has served the following discovery: initial disclosures; initial
13 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of
14 Rule 30(b)(6) deposition of SFR; requests for production to the HOA; interrogatories
15 to the HOA; notice of Rule 30(b)(6) deposition of the HOA; subpoena *duces tecum* to
16 Alessi & Koenig (“Alessi”); and a subpoena for deposition testimony to Alessi.

17 To date, SFR has served the following discovery: initial disclosures; requests
18 for production to Chase; interrogatories to Chase; requests for admission to Chase;
19 notice of deposition of Chase.

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

21 The parties are awaiting responses to the served discovery requests and
22 Alessi’s responses to the subpoenas *duces tecum*. The Rule 30(b)(6) deposition for
23 SFR currently is set for December 8, 2017. In addition, the parties are working to
24 schedule Rule 30(b)(6) depositions for Alessi, the HOA, and Chase, but, as discussed
25 below, they seek to schedule the depositions of Chase and the HOA after the current
26 discovery cutoff.¹

27 ¹ The parties further reserve their rights to meet and confer and, if necessary, engage
28 in motion practice regarding any discovery issues that may arise.

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

2 Good cause exists for the requested extension, as it will provide time for the
3 parties to complete written discovery and schedule depositions in a way that
4 minimizes burden and increases efficiency. SFR and Chase are conferring about
5 potential dates for the deposition of Chase’s Rule 30(b)(6) designee, who lives out of
6 state. In addition, SFR has served voluminous written discovery requests on Chase.
7 While Chase requires additional time to respond to SFR’s discovery, Chase’s current
8 response deadline is December 17, 2017—*i.e.*, only a few days before discovery ends
9 on December 20, 2017. SFR is willing to provide Chase with an extension for its
10 responses, but it cannot do so unless discovery is extended. Accordingly, the
11 requested extension to the scheduling order deadlines will minimize the cost and
12 burden to the witness and provide sufficient time for Chase to respond to SFR’s
13 discovery. It will also permit SFR to depose Chase after receiving Chase’s discovery
14 responses, a logical process that will enable SFR to conduct an efficient, productive,
15 and targeted deposition. SFR anticipates that it will be able to significantly limit the
16 scope of the deposition based on the responses to its written discovery.

17 In addition, the HOA’s Rule 30(b)(6) designee lives in Alabama and travels to
18 Las Vegas monthly for depositions. While Chase’s counsel anticipated deposing the
19 HOA’s designee on December 14 or 15, 2017, this date is no longer practicable as
20 counsel’s office is moving to a new location on December 15, 2017. Accordingly, the
21 next available date for the HOA’s deposition is not until January, 2018.

22 Finally, this is the parties’ first request to extend discovery in this case, and
23 they seek only a 60-day extension. The parties have diligently engaged in discovery
24 to date and seek this extension in good faith.

25 **D. Proposed Discovery Deadlines**

26 The parties request an order extending the close of discovery, the deadline to
27 file dispositive motions, and the deadline to file a pre-trial order by 60 days. This
28 extension is reasonable and necessary given the good cause set forth above.

Event	Current Deadline ²	New Deadline
Close of Discovery	December 20, 2017	February 19, 2018 ³
Dispositive Motions	January 19, 2018	March 20, 2018
Pre-Trial Order	February 20, 2018	April 23, 2018 ⁴

IT IS SO STIPULATED.

Respectfully submitted this 29th day of November, 2017.

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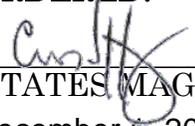
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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE
DATED: December 1, 2017

² See Scheduling Order, ECF No. 27.

³ Sixty days after December 20, 2017, falls on Sunday, February 18, 2018. The deadline is thus advanced to the next judicial day.

⁴ Sixty days after February 20, 2018, falls on Saturday, April 21, 2018. The deadline is thus advanced to the next judicial day.