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 11 *JPMorgan Chase Bank, N.A.*

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

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

15 Plaintiff,

16 v.

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

20 Defendants.

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

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

**(Second Request)**

21 SFR INVESTMENTS POOL 1, LLC, a  
 22 Nevada limited liability company

23 Counter/Cross-Claimant,

24 v.

25 JPMORGAN CHASE BANK, N.A., a  
 national banking association; UNITED  
 26 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 (“Seven Hills”), by and through their respective counsel of record,  
5 stipulate and request that this Court extend discovery and dispositive motion  
6 deadlines in the above-captioned case for 30 days. The parties request this extension  
7 to complete party depositions, specifically the deposition of Chase, whose designated  
8 witness underwent significant surgery in December and requires until at least the  
9 end of January or beginning of February 2018 to recuperate, and responses to  
10 written discovery. The parties have conferred and agree that this brief extension is  
11 the most reasonable way to complete discovery in this case, so that Chase’s  
12 designated witness has sufficient time to attend to necessary medical treatment.

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

16 **I. Discovery Completed to Date**

17 To date, Chase has served the following discovery: initial disclosures; initial  
18 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of  
19 Rule 30(b)(6) deposition of SFR; requests for production to Seven Hills;  
20 interrogatories to Seven Hills; notice of Rule 30(b)(6) deposition of Seven Hills;  
21 subpoena to produce documents on non-party Alessi & Koenig, LLC; and subpoena to  
22 testify at a deposition on non-party Alessi & Koenig, LLC.

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;  
25 and notice of Rule 30(b)(6) deposition of Chase. SFR has also responded to Chase’s  
26 requests for production and interrogatories to SFR.

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

28 SFR has noticed a Rule 30(b)(6) deposition of Chase. As discussed below,

1 however, the parties seek to reschedule Chase's deposition to occur only days before  
2 the current discovery cutoff of February 19, 2018, which would leave the parties very  
3 little time to obtain the deposition transcript prior to the dispositive motion deadline  
4 and would not provide Chase sufficient time to review and correct the deposition  
5 transcript prior to the dispositive motion deadline.<sup>1</sup> Chase has also noticed  
6 depositions of SFR, Seven Hills, and non-party Alessi & Koenig, LLC. Chase is  
7 currently preparing its responses and objections to SFR's requests for admission to  
8 Chase, requests for production to Chase, and interrogatories to Chase. Additionally,  
9 Seven Hills is in the process of providing its written responses to Chase's written  
10 discovery requests.

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

12 SFR had noticed Chase's deposition for December 1, 2017, but Chase's Rule  
13 30(b)(6) designee was unavailable on this date because the designee was preparing to  
14 undergo significant surgery in December, which she underwent and from which she  
15 will need to recuperate until at least the end of January or beginning of February  
16 2018. The parties have met and conferred about rescheduling Chase's deposition in  
17 this lawsuit to take place during the week of February 12-16, 2018, when the Chase  
18 designee should be recuperated from surgery and able to travel to Las Vegas. This is  
19 the parties' second request to extend the discovery period in this case, and they seek  
20 the extension so that Chase's designated witness may have an opportunity to receive  
21 necessary medical treatment and recover from the same. The requested extension  
22 will also provide additional time for Seven Hills to provide its responses to Chase's  
23 written discovery. The parties have diligently engaged in discovery to date and seek  
24 this extension in good faith.

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27 <sup>1</sup> 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.

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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.

<b>Event</b>	<b>Current Deadline<sup>2</sup></b>	<b>New Deadline</b>
Close of Discovery	February 19, 2018	March 21, 2018
Dispositive Motions	March 20, 2018	April 20, 2018 <sup>3</sup>
Pre-Trial Order	April 23, 2018	May 23, 2018

*[continued on next page]*

<sup>2</sup> See Scheduling Order, ECF No. 45.

<sup>3</sup> April 20, 2018 is 30 days after March 21, 2018, the proposed discovery close date.

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

2 **IT IS SO STIPULATED.**

3 Dated: January 10, 2018

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19 *Attorneys for Defendant Seven Hills*  
20 *Master Community Association*

21 **ORDER**

22 **IT IS SO ORDERED:**

23   
24 UNITED STATES MAGISTRATE JUDGE

25 January 11, 2018  
26 DATED: \_\_\_\_\_