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10 *Attorneys for JPMorgan Chase Bank, N.A.*

11 **UNITED STATES DISTRICT COURT**

12
13 **DISTRICT OF NEVADA**

14
15 JPMORGAN CHASE BANK, N.A.,
16
17 Plaintiff,

18 vs.

19 SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company; SEVEN
20 HILLS MASTER COMMUNITY
ASSOCIATION, a Nevada non-profit
21 corporation; and VENANCIO H. REYES,
22 JR., an individual,
23
24 Defendants.

25 SFR INVESTMENTS POOL 1, LLC, a
Nevada limited liability company
26
27 Counterclaimant/Cross-Claimant,

28 vs.

Case No.: 2:17-CV-00321-GMN-GWF

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

(First Request)

1 JPMORGAN CHASE BANK, N.A.;
2 MORTGAGE ELECTRONIC
3 REGISTRATION SYSTEMS, INC. AS
4 NOMINEE BENEFICIARY FOR
5 COUNTRYWIDE HOME LOANS, INC., a
6 New York corporation; REAL TIME
7 RESOLUTIONS, INC.,

Counter/Third-Party/Cross-
Defendants.

8 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan
9 Chase Bank, N.A. (“Chase”), Defendant/Counterclaimant/Cross-Claimant SFR
10 Investments Pool 1, LLC (“SFR”), and Defendant Seven Hills Master Community
11 Association (“Seven Hills”), by and through their respective counsel of record,
12 stipulate and request that this Court extend discovery and dispositive motion
13 deadlines in the above-captioned case for 60 days, to permit the parties to complete
14 party depositions, and specifically the deposition of Chase, whose designated witness
15 underwent significant surgery in December, from which she will not have
16 recuperated until at least the end of January or beginning of February 2018. The
17 parties have conferred and agree that this brief extension is the most reasonable way
18 to complete discovery in this case, including so that Chase’s designated witness has
19 sufficient time to attend to necessary medical treatment and recuperate before
20 traveling to Las Vegas for her depositions in not only this action but numerous other
21 lawsuits between Chase and SFR involving homeowners’ association foreclosure
22 sales.

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

26 **A. Discovery Completed to Date**

27 To date, Chase has served the following discovery: its initial disclosure of
28 documents and witnesses and its initial expert disclosure.

To date, SFR has served the following discovery: its initial disclosure of

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1 documents and witnesses and notice of Rule 30(b)(6) deposition of Chase and notice
2 of deposition of Mortgage Electronic Registration Systems, Inc.

3 Moreover, on December 20, 2017, the Parties filed their interim status report.
4 *See* ECF No. 35.

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

6 SFR has noticed a Rule 30(b)(6) deposition of Chase for January 11, 2017. As
7 discussed below, however, the parties seek to reschedule Chase's deposition to occur
8 after the current discovery cutoff of February 22, 2018.¹ Chase plans to notice
9 depositions of SFR, Seven Hills, and non-party Alessi & Koenig, LLC. Chase and
10 SFR are currently preparing written discovery to be served on each other. Chase is
11 also preparing written discovery to be served on Seven Hills.

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

13 SFR has noticed Chase's deposition for January 11, 2018, but Chase's Rule
14 30(b)(6) designee is unavailable on this date because the designee will be recovering
15 from a significant surgery she underwent in December. It is not known at this point
16 when her doctor will clear her to fly again, and she may be unable to fly until the end
17 of January or beginning of February 2018. The parties have met and conferred about
18 rescheduling Chase's deposition in this and other similar lawsuits to the week of
19 March 19, 2017. Although it is anticipated that Chase's designated witness should
20 be able to fly by February 2018, the parties are unable to schedule her deposition in
21 February as the witness will be testifying in numerous other lawsuits that month
22 (the rescheduling of which was also necessitated by her surgery.)

23 This is the parties' first request to extend the discovery period in this case, and
24 they seek the extension so that Chase's designated witness may have an opportunity
25 to receive necessary medical treatment and recover from the same, which treatment

26 _____
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 and recovery were not anticipated at the time the parties filed their first proposed
2 scheduling order. The parties have diligently engaged in discovery to date, met and
3 conferred regarding the requested extension and scheduling of outstanding discovery
4 items, and seek this extension in good faith.

5 **D. Proposed Discovery Deadlines**

6 The parties request an order extending the close of discovery, the deadline to
7 file dispositive motions, and the deadline to file a pre-trial order by 60 days.

Event	Current Deadline ²	New Deadline
Close of Discovery	February 22, 2018	April 23, 2018
Dispositive Motions	March 26, 2018	May 25, 2018
Pre-Trial Order	April 25, 2018	June 25, 2018

13 [Continued on the following page]

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27 ² See Scheduling Order, ECF No. 16.

1 This extension is not requested for purposes of delay and is reasonable and
2 necessary given the good cause set forth above.

3 **IT IS SO STIPULATED.**

4 Dated: January 5, 2018

5 KIM GILBERT EBRON

BALLARD SPAHR LLP

6 By: /s/ Diana S. Ebron

By: /s/ Maria A. Gall

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22 *Attorneys for Seven Hills Master
23 Community Association*

24 **ORDER**

25 **IT IS SO ORDERED:**

26 
27 UNITED STATES MAGISTRATE JUDGE

28 DATED: January 8, 2018

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CERTIFICATE OF SERVICE

I certify that on January 5, 2018, and pursuant to Federal Rule of Civil Procedure 5, true copies of the foregoing **STIPULATION AND ORDER TO EXTEND SCHEDULING ORDER DEADLINES BY 60 DAYS** was sent to the following parties via U.S. Mail at the following addresses:

Real Time Resolutions, Inc.
c/o The Corporation Trust Company of Nevada
701 S. Carson St., Suite 200
Carson City, NV 89701

Venancio Reyes, Jr.
1850 E. Serene Ave., Suite 101
Las Vegas, NV 89123

/s/ Mary Kay Carlton
An employee of BALLARD SPAHR LLP

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